

EXHIBIT 3

UNCERTIFIED ROUGH DRAFT - T. ADAMS

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1 THE VIDEOGRAPHER: We're now on the record.
2 Here begins tape number one in the videotaped
3 deposition of Tamara Adams. It's taken in the
4 matter of National Urban League, et al, versus
5 Wilber L. Ross, Jr., et al.

6 Today's date, December 17, 2020. The
7 time on the video monitor is 9:42 a.m. Eastern
8 Standard Time. My name is Armando Forte. I am
9 the videographer representing Planet Depos.

10 All parties are attending this
11 deposition remotely. Will counsel please
12 identify themselves and who they represent?
13 Ms. Robinson.

14 MS. ROBINSON: Sure. My name is Anne
15 Robinson from Latham & Watkins, counsel for
16 plaintiffs. With me today are Shannon Lankenau
17 and Amit Makker also from Latham & Watkins.

18 THE VIDEOGRAPHER: Mr. Sverdlov.

19 MR. SVERDLOV: Morning. Alexander Sverdlov
20 from the U.S. Department of Justice Civil
21 Division representing the defendants in this

22 action and the Census Bureau in this deposition.
23 With me are a number of my colleagues from the
24 U.S. Department of Justice and the Commerce
25 Department whose names I believe have been read

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1 prior to the opening of this transcript.

2 THE VIDEOGRAPHER: Other appearances will be
3 noted on the transcript. Our court reporter for
4 today is Cheryl Sandeck representing Planet
5 Depos. She will now swear or affirm the witness
6 and we will proceed.

7 THE COURT REPORTER: Ma'am, please raise your
8 hand.

9 (Witness administered an oath.)

10 TAMARA ADAMS,
11 having been first administered an oath, was
12 examined and testified as follows:

13 THE VIDEOGRAPHER: Please begin.

14 EXAMINATION

15 BY MS. ROBINSON:

16 Q. Great. Good morning, Ms. Adams. Thank
17 you so much for joining us today.

18 A. You bet.

19 Q. So I'll just start with a few

20 introductory questions and some basic ground
21 rules to begin before jumping into more
22 substantive questions.

23 So can you please state your name for
24 the record one more time?

25 A. Tamara Adams.

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1 Q. And what is your current business
2 address?

3 A. 4600 Silver Hill Road, Suitland,
4 Maryland.

5 Q. And what's your job title?

6 A. Mathematical statistician.

7 Q. For the Census Bureau?

8 A. At the Census Bureau, yes.

9 Q. Okay. And how long have you had that
10 position?

11 A. I've been at census for 22 years; in my
12 current position for two.

13 Q. What position did you hold before that?

14 A. I have been a mathematical statistician
15 since.

16 Q. I'm sorry. Since -- were you going to
17 give a year?

18 A. 1998.

19 Q. Okay. But what was your job title
20 prior to the one you currently have?

21 A. My job title has remained similar. I
22 have changed positions within the Bureau.

23 Q. So what position did you hold before
24 your current position?

25 A. The same job in a different division of

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1 the Bureau.

2 Q. So what division are you in now and
3 what division were you in previously?

4 A. I was in the research and methods
5 director before. I'm now in decennial.

6 MR. SVERDLOV: I'm sorry. I just need to
7 state an objection on the record. Objection,
8 compound.

9 MS. ROBINSON: Okay.

10 BY MS. ROBINSON:

11 Q. Have you ever taken a deposition
12 before?

13 A. No.

14 Q. This is your first time being deposed?

15 A. Yes.

16 Q. Okay. And you understand that even
17 though you're in your house, not in a courtroom,
18 that you're under oath today and need to testify
19 truthfully?

20 A. Yes.

21 Q. Okay. And I'm sure counsel discussed
22 this with you. But there's a just a few basic
23 ground rules we say before all depositions so
24 I'll just go over them now.

25 If you don't understand a question,

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1 please ask me. If you answer a question, I will
2 assume you understood it.

3 MR. SVERDLOV: Objection, misleading.

4 BY MS. ROBINSON:

5 Q. We have a court reporter who is taking
6 down everything we say. And to make it easier
7 for her, please let me finish my question before
8 you start answering the question. And I will
9 let you finish your answers before I begin
10 asking the next question.

11 Does that make sense?

12 A. Yes.

13 Q. Great. If your attorney objects to my

14 question like Mr. Sverdlov just did, you must
15 still answer it unless he specifically instructs
16 you not to.

17 Does that make sense?

18 A. Yes.

19 Q. Is there any reason you cannot provide
20 truthful and complete testimony today?

21 A. No.

22 Q. Are you on any medications that would
23 affect your ability to give testimony today?

24 A. No.

25 Q. Great. So if at any point you need a

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1 break, please let me know and we will take a
2 break. However, if there is a pending question
3 before you, if I've asked a question, please
4 answer it before asking for the break.

5 A. Okay.

6 Q. And one final thing about the breaks is
7 please, and this is kind of a reminder to you
8 and to everyone on the call here, given we have
9 such a large group, please do not discuss the
10 substance of your testimony with anyone during
11 the breaks. So that can either be testimony

12 you've already given or what you might give in
13 the future.

14 A. Okay.

15 Q. Is that clear?

16 A. Yes.

17 Q. Okay. Great. So I'm going to now turn
18 to a few questions about the preparation for the
19 deposition today. When did you first learn
20 about this litigation?

21 A. Several months ago.

22 Q. Okay. And what has your involvement
23 been prior to preparing for this deposition in
24 the litigation?

25 A. Minimal. I've likely given information

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1 for others at the Bureau to use.

2 Q. What type of information?

3 A. Answers to questions that I may have
4 been asked.

5 Q. On what topics?

6 A. Data collection.

7 MR. SVERDLOV: Objection, beyond the scope.

8 MS. ROBINSON: I'm not asking this in her
9 30(b)(6) capacity. I'm just trying to get a

10 sense for what the witness knows and doesn't
11 know with the litigation.

12 MR. SVERDLOV: So in light of my objection,
13 the witness will answer in her personal
14 capacity.

15 MS. ROBINSON: That's fine.

16 BY MS. ROBINSON:

17 Q. So I'm sorry, you were saying,
18 Ms. Adams, questions about data sets?

19 A. Our data collection, operations and
20 systems.

21 Q. For the census or your data collection
22 for producing information in the litigation?

23 A. For the census.

24 Q. Okay. Thank you. If we -- if we could
25 bring up Exhibit 1, please, which is the amended

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1 deposition notice.

2 TECHNICIAN WERT: Sure. Stand by one moment.
3 And mark this as Exhibit 1, Counsel; is that
4 correct?

5 MS. ROBINSON: Oh, yes, thank you.

6 TECHNICIAN WERT: Sure thing.

7 (Whereupon, Adams Deposition

8 Exhibit 1 was marked for
9 identification.)

10 TECHNICIAN WERT: Exhibit 1 is on screen now.

11 BY MS. ROBINSON:

12 Q. Ms. Adams, can you see that okay --

13 A. Yes.

14 Q. -- that document? Okay. I believe
15 you've seen this before. This is the amended
16 deposition notice?

17 A. Yep. Can you scroll down, please?

18 Q. Yes. Yeah, and if you could actually
19 keep scrolling down until we get to the topics
20 page. Perfect.

21 Okay. So have you seen this document
22 before?

23 A. Yes.

24 Q. And you've reviewed it?

25 A. Yes.

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1 Q. And you generally understand the topics
2 listed here?

3 A. Yes.

4 Q. Great. So for the questions I ask
5 today on those topics I will assume that you are

6 answering on behalf of the defendants unless you
7 indicate otherwise.

8 Does that make sense?

9 MR. SVERDLOV: Objection, misleading and also
10 inconsistent with the notice and our
11 representations that this witness is being
12 proffered on behalf of the Census Bureau.

13 BY MS. ROBINSON:

14 Q. You may answer.

15 A. Can you ask your question again?

16 Q. Yeah, sure. So for the questions --
17 yeah. So for the questions that I ask you
18 today, I'll, you know, say that in relation to
19 the topics that you are testifying on today as
20 opposed to the next witness, your answers will
21 be on behalf of the defendants unless you
22 indicate others.

23 A. My answers are on behalf of the Census
24 Bureau only.

25 Q. Okay. Great.

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1 So looking at topic number one first,
2 the Census Bureau's retention, organization and
3 management of documents.

4 A. Yes.

5 Q. Did you prepare to testify about this
6 topic today?

7 A. Yes.

8 Q. What did you do to prepare testifying
9 on this topic?

10 A. Reviewed documents that have been
11 provided as part of the collection efforts and
12 discussed them with counsel.

13 Q. Okay. How long were your meetings with
14 counsel, approximately, and how many were there?

15 A. We met Tuesday and Wednesday, probably
16 six hours each day.

17 Q. Okay. Were those meetings in person,
18 virtual?

19 A. Virtual.

20 Q. Did you take any notes during those
21 meetings?

22 A. No.

23 Q. Did you review any documents other than
24 what has already been produced this morning?

25 A. No.

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1 Q. Did you speak to anyone other than

2 those meetings with counsel?

3 A. No.

4 MR. SVERDLOV: Objection, vague.

5 BY MS. ROBINSON:

6 Q. Okay. So moving on to topic two, did
7 you prepare to testify today about topic two?

8 A. Yes.

9 Q. Did you use the same preparation
10 process we just discussed for topic one?

11 A. Yes.

12 Q. Did you do anything in addition to that
13 preparation process?

14 MR. SVERDLOV: Objection, vague.

15 THE WITNESS: No, no.

16 BY MS. ROBINSON:

17 Q. Okay. Are you prepared today to
18 testify about topic three?

19 A. Yes.

20 Q. And did you prepare for it in the same
21 way you prepared for topics one and two?

22 A. Yes.

23 Q. Did you talk to anybody outside of
24 counsel to prepare for topic three?

25 MR. SVERDLOV: Objection, vague. And to the

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1 extent that -- to the extent that this question
2 verges into the nature and substance of the
3 preparations that the witness had with counsel,
4 I will instruct the witness not to answer.

5 MS. ROBINSON: Just to be clear, I said
6 outside of counsel. So I'm not asking about
7 what was discussed with counsel. I'm asking if
8 she spoke with anybody to prepare for topic
9 three beyond speaking with counsel.

10 MR. SVERDLOV: I will -- I will maintain the
11 same objection. I will instruct the witness to
12 answer to the extent she had any meetings or
13 conversations where counsel was not also
14 present.

15 THE WITNESS: I did not have any meetings
16 where counsel was not present.

17 BY MS. ROBINSON:

18 Q. For the meetings with counsel, who else
19 was present?

20 A. Can you clarify?

21 Q. Sure. So you met with counsel to
22 prepare for this deposition today, correct?

23 A. Correct.

24 Q. Who was at those meetings? Can you

25 just give me the names, please?

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1 A. Yeah, let me think.

2 Q. Sure. Take your time.

3 A. Hold on. Kathleen Styles.

4 Q. Okay.

5 A. And then we asked several people to
6 join us. James Christy, Marianne Chapin, David
7 Ragland.

8 Q. Okay. And then who -- what counsel was
9 there? Mr. Sverdlov?

10 A. Yes.

11 Q. Anyone else?

12 A. A whole series of attorneys from DOJ
13 and commerce whose names I do not know. I'm
14 sorry.

15 Q. Understood. No problem at all.

16 A. There's a lot of people on that list.

17 Q. Right. That same group was at the
18 meeting both days; is that right?

19 MR. SVERDLOV: Objection, misleading.

20 THE WITNESS: To the extent that I can
21 recognize voices on the phone, yes.

22 BY MS. ROBINSON:

23 Q. Okay. Thank you.

24 Okay. And just to clarify, you will

25 not be testifying today on topics four, five,

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1 and six, correct?

2 A. Correct.

3 Q. Okay. Great. Thank you. That's all

4 with this exhibit, if you wouldn't mind taking

5 it down. Great.

6 So Ms. Adams, now I'm going to turn to

7 a few questions about the data and organization

8 of data at the Census Bureau.

9 A. Sure.

10 Q. So perhaps it makes sense to start at a

11 high level. Can you please provide an overview

12 of the Census Bureau's data systems including

13 the data information that is accessible on those

14 systems that is related to the census?

15 MR. SVERDLOV: Objection. Vague and

16 compound.

17 THE WITNESS: All right. So let's break that

18 down quite a bit. So I think the first thing

19 you asked are about the data systems at the

20 Census Bureau, correct?

21 BY MS. ROBINSON:

22 Q. Uh-huh.

23 A. Okay. You've been provided with a
24 slide deck that lists out the 52 systems that
25 the census uses to collect decennial data and

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1 process. Within those 52 systems, we accomplish
2 all of the tasks we need to do to collect and
3 process data, hire our staff, pay them.

4 Each of those systems has some method
5 of storing the data, if necessary. Let's see,
6 so you asked about the systems. You asked about
7 the data that are underneath them, correct?

8 Q. Yes. We can go through the 52 if that
9 is a more organized fashion to proceed in.

10 A. No, we don't need to go through -- if
11 you'd like to go through each of the 52 systems
12 we can, but if I remember your question right,
13 you asked about the systems that we have and the
14 data that we store within them.

15 Q. Uh-huh.

16 A. Okay. For those 52 systems, where
17 appropriate, we have some sort of data -- some
18 sort of mechanism with which we store data.

19 Often it is a database, sometimes it's a
20 different method.

21 For the relevant systems that we have
22 discussed in the last few days, each of those
23 systems has one or many databases that underlie
24 that system that store our data.

25 MS. ROBINSON: If we could please pull up

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1 Exhibit 2.

2 (Whereupon, Adams Deposition
3 Exhibit 2 was marked for
4 identification.)

5 TECHNICIAN WERT: Stand by one moment.

6 BY MS. ROBINSON:

7 Q. So Ms. Adams, as he is pulling that up,
8 I have not reviewed the documents that you --
9 your counsel produced this morning. But I do
10 have the list of 52 from a PMR deck here so I do
11 think, just so we're all talking about the same
12 thing, given how technical this topic is, I just
13 think it might be helpful to have the names up,
14 if that makes sense.

15 A. Absolutely.

16 Q. Great. So if we can scroll down to,

17 it's page 147 on the bottom of the screen there.

18 There we go. Great.

19 So if I could ask some questions about
20 some specific systems as they are called on this
21 slide.

22 A. Sure.

23 Q. Great. So -- well, as an initial
24 matter, I'll ask a few larger topic questions
25 and we can scroll through. There's just a

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1 couple pages of these.

2 My first question is, are all of these
3 52 systems being used currently?

4 MR. SVERDLOV: Objection, vague, compound,
5 and I will also object on the basis of
6 foundation since counsel is referencing a
7 document and we are not clear what the
8 provenance of that document is.

9 BY MS. ROBINSON:

10 Q. Ms. Adams, you can go ahead and answer
11 the question.

12 A. Okay. Let's go ahead and scroll -- can
13 you scroll through each of them? Let me take a
14 look at them real quick.

15 Q. Sorry, there we go. And you can also
16 ask for control, Ms. Adams, so you can actually
17 scroll through this at your leisure just to make
18 sure that it's the right list.

19 A. Okay. So some of these systems have
20 since been decommissioned.

21 Q. Uh-huh.

22 A. Because they're no longer in use for
23 our data collection.

24 Q. Yeah. So which of the 52 are, in fact,
25 not being used?

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1 A. We can get that information for you. I
2 can't produce a list off the top of my head.

3 Q. So sitting here today, you're not able
4 to testify about which specific systems are in
5 use currently at the Census Bureau?

6 MR. SVERDLOV: Objection, misleading.

7 BY MS. ROBINSON:

8 Q. You can answer.

9 A. Correct. We would need to gather a
10 list of those.

11 Q. Okay. Can you tell me which systems
12 are in use, to the best of your knowledge?

13 A. I can get -- if we want to know which
14 systems aren't in use, we can get that list. If
15 I don't know which ones aren't in use, I can't
16 know totally which ones are; it's just the
17 converse.

18 Q. Okay. Do you know, for example, if
19 number seven, the Census Data Lake is in use?

20 A. Yes, it is.

21 Q. Which other systems do you know are in
22 use today?

23 A. Do we want to go line by line?

24 Q. Please.

25 A. The 2020 website, ATAC. I'm not

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1 certain about BARCA. CAES. CaRDS. CBS. CDL.
2 CEDSCI. I don't know about CEM. I do not know
3 about CENDOCs. Centurion for decennial purposes
4 is not in use any more.

5 CHEC is still in use. CHRIS. CIRA. I
6 do not know if CQA is still fully -- has any
7 pieces remaining. I do not know about CRM. DAPPS is
8 in use. I don't know about Desktop Services or
9 the Data Management Platform. DRPS is in use.
10 I don't know about DPACS.

11 Decennial Service Center is in use.
12 ECaSE Enum is in use. ECaSE FLD OCS is in use.
13 ECaSE ISR is not. I do not know if ECaSE OCS is
14 still in use. I do not know about Geospacial
15 Services or GUPS. iCADE is no longer being used
16 for decennial purposes. IDMS is in use.
17 I do not know about ILMS. IPTS is in
18 use. LiMA is not in use for decennial purposes.
19 MaCS is not in use for decennial purposes.
20 MAF/TIGER is still being used. MCM I
21 do not know. MOJO Optimizer is no longer in
22 use. MOJO Field Processing is. NPC is not for
23 decennial purposes. I do not know about OneForm
24 Designer Plus. I do not know about PEARSIS.
25 Okay. Hold on. Let me read these

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1 close. 42 in use. 43 is in use. 44 is in use.
2 I do not know about 45. 46 -- I do not about
3 46. 47 is in use. SOA is in use. I do not
4 about 49. 50 is still in use. 51 is still in
5 use. And I do not know about 52 from a
6 decennial standpoint.
7 Q. Okay. Thank you so much.
8 A. You bet.

9 Q. Are there any systems that are in use
10 that do not appear on this list?

11 MR. SVERDLOV: Objection, vague.

12 THE WITNESS: This is a comprehensive list of
13 all of the systems for the decennial census. So
14 if your a system in the decennial system, you
15 need to be on this list.

16 BY MS. ROBINSON:

17 Q. So there are no systems being used in
18 the decennial census that do not appear on this
19 list?

20 MR. SVERDLOV: Objection, vague and
21 misleading.

22 BY MS. ROBINSON:

23 Q. You can answer.

24 A. So this is the comprehensive list of
25 the 52 decennial systems we've used for data

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1 collection and processing.

2 Q. Understood. But just to clarify, even
3 though this is a comprehensive list, your
4 testimony is that there are not any systems
5 being used that do not appear on this list?

6 MR. SVERDLOV: Objection, asked and answered

7 and misleading.

8 BY MS. ROBINSON:

9 Q. Okay. So to start, I would like to ask
10 you a few questions about the Census Data Lake.

11 A. Sure.

12 Q. Could you please tell me what is on
13 that system and what it's used for?

14 A. Sure.

15 MR. SVERDLOV: Objection, vague -- sorry.
16 Objection, vague and compound.

17 BY MS. ROBINSON:

18 Q. Please go ahead.

19 A. Okay. So let's start with what it's --
20 what is in there and then we'll talk about what
21 it's used for. So what is in there is any
22 census data that's response data, and paradata.
23 And paradata are those data that are about our
24 operations. Any of those data that need to be
25 retained are in the Census Data Lake. So I

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1 think that was question one, what is in there.

2 What it is used for is to generate
3 reports for any ad hoc analysis that needs to
4 happen and it is used to transmit data to other

5 systems to be used to -- for post processing.

6 Q. Thank you.

7 A. You bet.

8 Q. How long is the data retained on that
9 system?

10 MR. SVERDLOV: Objection, vague.

11 THE WITNESS: If the question is are the data
12 still there, yes, they are. The time frame by
13 which it is -- the time frame that we maintain
14 that data actively, we would need to go and find
15 that answer for you.

16 BY MS. ROBINSON:

17 Q. Was that system used in prior censuses?

18 A. No.

19 Q. So turning to the general reports that
20 you mentioned --

21 A. Uh-huh.

22 Q. -- what -- what are those reports that
23 come out of the Census Data Lake?

24 A. Sure. So can we scroll all the way to
25 the --

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1 MR. SVERDLOV: Tammy, one second. I

2 apologize. Objection, vague.

3 Please continue.

4 THE WITNESS: Sure. So the Census Data Lake
5 houses the data and performs computations.
6 System number 51, the Unified Tracking System,
7 or UTS, is the business intelligence vehicle by
8 which we display our reports and access them.

9 So the reports that are used to manage
10 the census at headquarters are generated in CDL,
11 and UTS is a pair of systems.

12 BY MS. ROBINSON:

13 Q. Just to make sure I understand, so the
14 data comes from the CDL but the reports are
15 viewed in UTS?

16 A. Exactly.

17 Q. Okay. I got it. Great. And what are
18 the reports in UTS that draw on the data from
19 CDL?

20 MR. SVERDLOV: Objection, vague.

21 THE WITNESS: There are a -- for each
22 operation that occurs in the census there is a
23 series of predefined reports. Those reports
24 touch on topics like the progress of the census,
25 that particular operation within the census, the

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1 cost of that operation in the census, the
2 quality of that operation.

3 So all of the things that we want to
4 use to manage that operation from a headquarters
5 perspective are generally included in the UTS.

6 BY MS. ROBINSON:

7 Q. Okay. And is there a document that
8 provides a list of all of those reports?

9 A. Yes.

10 MR. SVERDLOV: Objection, vague.

11 BY MS. ROBINSON:

12 Q. What is that document called?

13 MR. SVERDLOV: Objection, assumes facts not
14 in evidence.

15 MS. ROBINSON: The witness just said yes.

16 MR. SVERDLOV: In that case, objection,
17 misleading. That was not the witness's
18 testimony.

19 MS. ROBINSON: I can ask again.

20 BY MS. ROBINSON:

21 Q. Is there a document that lists the
22 reports that are available from UTS?

23 A. There is a requirements document for
24 UTS.

25 Q. Okay. And does that requirements

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1 document list the reports available in UTS?

2 A. Yes.

3 Q. Was that document produced this
4 morning?

5 A. Is that question for me?

6 Q. Uh-huh, if you know.

7 A. I do not know.

8 Q. Did you use that document to prepare
9 for the deposition today?

10 A. No.

11 Q. Okay. About how many reports are
12 listed on that document?

13 MR. SVERDLOV: Objection, vague and
14 foundation.

15 THE WITNESS: Without the document in front
16 of me, I wouldn't even try to guess how many
17 there are.

18 BY MS. ROBINSON:

19 Q. Can you provide an approximation. Is
20 it five reports or 500 reports?

21 A. Something between five and 500.

22 Q. Okay. How about between 300 and 500?

23 A. I don't know. We would have to get a

24 number for you.

25 Q. Okay. And are those reports that we're

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1 talking about only the ones that are tied to the
2 CDL data?

3 MR. SVERDLOV: Objection, vague.

4 THE WITNESS: Can you reask your question?

5 BY MS. ROBINSON:

6 Q. I can, yeah.

7 A. I want to make sure I hear it.

8 Q. It's very technical stuff and I don't
9 have the documents in front of me. So I
10 appreciate your patience here.

11 A. You bet.

12 Q. In my mind I'm picturing this
13 requirements document that pertains to the UTS.
14 And we know there is some set of reports that
15 can be generated from UTS. We don't know the
16 exact number.

17 I'm wondering if that requirements
18 document and those reports from UTS are just
19 related to data from the CDL or does UTS pull in
20 data from other systems as well?

21 MR. SVERDLOV: Objection, vague and --

22 THE WITNESS: No, the --

23 MR. SVERDLOV: Objection, vague and compound.

24 THE WITNESS: UTS uses data only from CDL.

25

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28

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Thank you. Okay. Makes sense.

3 The reports that come from UTS, who
4 receives those reports?

5 MR. SVERDLOV: Objection, vague.

6 THE WITNESS: So do you want a type of person
7 who would receive those reports, groups of
8 people? What kind of information are you
9 looking for?

10 BY MS. ROBINSON:

11 Q. All of the above. If it's divisions
12 that receive them on a regular basis. I'd like
13 to know that. Whoever receives those reports.

14 A. It is those people who are involved in
15 managing that particular operation at
16 headquarters. So any of the executive staffs,
17 any of the people working on that operation
18 would receive the report.

19 In addition, there are some reports

20 that are sent to oversight. So they can also
21 see how the census is progressing.

22 Q. Okay. How about Mr. Dillingham, what
23 reports does he receive?

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: We can get a list for you but I

↑

29

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 couldn't tell you off the top of my head.

2 BY MS. ROBINSON:

3 Q. He receives reports on a regular basis?

4 MR. SVERDLOV: Objection, vague.

5 THE WITNESS: Again, we'd have to get a list.

6 BY MS. ROBINSON:

7 Q. Who would have that list?

8 MR. SVERDLOV: Objection, misleading.

9 THE WITNESS: So you're specifically asking
10 about reports from UTS, correct?

11 BY MS. ROBINSON:

12 Q. Right.

13 A. Then we'd have to get that list from
14 the people who manage UTS.

15 Q. Okay. And what group is that?

16 A. The people who manage UTS.

17 Q. Is there a --

18 A. UTS team.

19 Q. Fair enough. Okay. Is there a certain
20 individual?

21 A. They've got a team of people who manage
22 the UTS and we could get the information from
23 them.

24 Q. Okay. So you don't know anyone's name
25 who is on the UTS team?

↑

30

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. There is many people on that team. We
2 get it from whomever is most appropriate that
3 day.

4 Q. Okay. Do the reports issued from UTS
5 have to go to the disclosure review board before
6 being released?

7 A. No, they're accessed within a system
8 and when you authenticate to that system you
9 accept that you can see data that are Title 13.

10 Q. Okay. Are all of the reports --

11 A. There are also reports that are emailed
12 out, but they are at sufficient level that they
13 do not contain any Title 13 data.

14 Q. Okay. What reports are those?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: We'd need to get a list of
17 every report that's emailed. They are generally
18 high level reports about the progress of a given
19 operation.

20 BY MS. ROBINSON:

21 Q. Do you know about how many reports can
22 be emailed?

23 A. Not without seeing --

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: Yeah, not without a list.

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31

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay. And that would be the same list
3 that you need to get from the UTS team?

4 A. Correct.

5 Q. Okay. So UTS generates a series of
6 reports, some of which have to be viewed in the
7 system because they have confidential
8 information; is that right?

9 A. They have to be viewed in the system
10 because that is how we are set up and it allows
11 you -- one, there can be lower level information
12 that would be considered title data. It also
13 allows the ability for a user to interact with

14 the system and request information. I want to
15 see completion as of 12/17 versus I want to see
16 completion as of 12/16.

17 Q. Do you know if Mr. Dillingham reviews
18 those reports in the system?

19 A. I do not know. We would have to ask.

20 MR. SVERDLOV: I want to object to the last
21 question as vague -- on the basis that it's
22 vague as to time.

23 BY MS. ROBINSON:

24 Q. So you provided a high level
25 description of the type of data that's in the

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32

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 CDL. Can we get a bit more granular and could
2 you please provide the names of all of the
3 columns that are in CDL?

4 MR. SVERDLOV: Objection, vague and
5 foundation.

6 THE WITNESS: If -- we would need to get a
7 document for you that has that if you would like
8 to see the column names. I can describe the
9 types of data that are in there. And I could
10 name very many columns, but we would be here
11 quite some time.

12 BY MS. ROBINSON:

13 Q. If you could please describe the types
14 of data in CDL on the most granular level that
15 you are able to.

16 A. Sure. So the data -- let's divide it
17 into categories. I think that's probably the
18 easiest way to describe it, and we'll go through
19 it in kind of a set of chunks that touch each of
20 our operations.

21 So likely the thing people are most
22 familiar with is response data and those are
23 data that we -- those are the data that we ask
24 on our questionnaires from our respondents.

25 Things like a roster of people living

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33

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 in a house on census day, their names, their
2 ages, their sex, relationship to household or
3 race, Hispanic origin. These are familiar to
4 many people who have responded to the census.
5 It's the same kinds of things you may have put
6 into your own form.

7 All of those data that were collected
8 from a respondent live in the CDL. So that's
9 response data. And that's kind of the first

10 thing. For anybody who responded to the census,
11 we've got their data in the CDL.

12 We also have paradata. Paradata varies
13 by operation and by data collection method.
14 Paradata is the data we collect about our data
15 collection. So it can vary by the different
16 data collection methods. For something like the
17 internet self-response, we can know things like
18 it took somebody one minute to answer this
19 question or they were using a Firefox browser.
20 Those kind -- that kind data would be collected
21 for each operation.

22 For something like the nonresponse
23 follow-up we would collect things like where
24 the -- how long screen transitions took, whether
25 or not -- I'm trying to think of types of

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 information that would be interesting and that
2 we will likely talk about later.

3 Q. Yeah.

4 A. You know, how long did the interview
5 take.

6 Q. Uh-huh.

7 A. Did somebody say they don't know to a

8 question or something of that nature.

9 Because we've got online handheld
10 instruments and internet instruments now, we
11 collect -- we have far more data than we ever
12 had before to both manage, use our operations,
13 manage or data collection and to use in
14 post-processing. So that's great.

15 We also have data about every time that
16 we contact a respondent, especially during the
17 nonresponse follow-up. If we knock on a door we
18 have a record of that. If we sent a case out
19 for an assignment, we have a record for that.
20 That's also kind of part of our -- it's -- while
21 it's not listed on this slide, maybe you can
22 consider it paradata. It is also part of the
23 data that we store in the CDL. So that's a lot
24 of things about how we collect data.

25 We also store how often people work.

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1 Their time sheet data are stored in there so
2 that we can do reports about how many hours
3 people have worked, that sort of thing. All of
4 those data are also stored in the Census Data
5 Lake. Our workloads are stored there.

6 So those are the universe that we use
7 for each of our operations. These IDs are
8 eligible for internet self-response. This set
9 of units is eligible for the nonresponse
10 follow-up. This set of units is going to
11 reinterview. All of that is also stored in the
12 Census Data Lake.

13 Q. Great. Thank you. Very helpful.

14 A. Yes.

15 Q. Any other categories of data in the CDL
16 that you didn't already cover?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: If there are, I'm not
19 remembering them right at the moment. If we
20 were to look at a list, I could probably give
21 you more. But that covers likely the broad
22 categories of data that are in the CDL.

23 BY MS. ROBINSON:

24 Q. Great. Is there a list of the
25 categories of data in the CDL?

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection, vague.

2 THE WITNESS: Categories, no. The data that
3 CDL receives and stores, yes.

4 BY MS. ROBINSON:

5 Q. What is that document called?

6 MR. SVERDLOV: Objection, vague and
7 misleading.

8 THE WITNESS: I don't know that there is a
9 name of it. It could be generated from the lake
10 itself or there is various documents that talk
11 about the data transfers that go to the lake.

12 BY MS. ROBINSON:

13 Q. Are those manuals?

14 A. Not manuals as you might think of them.
15 They are -- between systems we have
16 interconnection documents that document what
17 data transfer between systems so that we know
18 exactly what data are going where.

19 Q. Understood.

20 Do some of the other systems on this
21 list of 52 feed into the CDL?

22 A. Many of them.

23 MR. SVERDLOV: Objection, vague.

24 BY MS. ROBINSON:

25 Q. Okay. Which ones?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. This is likely a question best answered

2 by getting a very comprehensive list. Would it
3 be easiest for me to answer those that will be
4 relevant to many of the questions that were in
5 the request for production?

6 Q. Yes. Thank you.

7 A. Okay. Let's do it that way.

8 All right. So the -- based on the
9 request for production, I'm going to describe
10 the systems that I -- that are relevant that we
11 should -- that we'll talk about in those
12 questions. This should not be taken to be a
13 comprehensive list of everything that gives data
14 to the lake. I think that would be a little --
15 in order to do a comprehensive list, we would
16 want it written down rather than me telling you.

17 So the systems that are going to be
18 relevant to our conversation today, let's go
19 down to -- let's skip to, let's see -- the
20 systems that are largely relevant to what we
21 will discuss today, let's go down one more,
22 please.

23 So ECaSE FLD OCS provides data to the
24 lake. That is a large part of the data that
25 creates reports for the nonresponse

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1 follow-follow up. ECaSE FLD OCS is the system
2 that we use to manage all OF our field
3 assignments to transmit data to the enumerator
4 device and it's where we receive the data back
5 from the enumerator device. So that's what
6 pumps data to CDL to make nonresponse follow-up
7 reports. Let's go down --

8 Q. Sorry, can I ask you one question
9 before you move off of that?

10 A. You can ask me many questions.

11 Q. What is the enumerator device?

12 A. So if you look at line 23 ECaSE Enum I
13 think we've all probably seen pictures of the
14 iPhones. Each enumerator is issued an iPhone
15 and it has Enum. Often it's called FDC. That's
16 what it's called on devise. The system itself
17 is called ECaSE Enum and it's an application
18 that lives on the device and that's what the
19 enumerator interacts with to both collect data,
20 to provide their availability, and to input
21 their time and expenses.

22 Q. Thank you.

23 A. You bet.

24 Q. So I think you were going to move to

25 another system that feeds into CDL.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection. There's no
2 question.

3 THE WITNESS: So based on the -- what we'll
4 discuss today, the ECaSE FLD OCS is the -- is
5 the system that provides most of the data for
6 the nonresponse follow-up reports that we'll
7 likely talk about.

8 There is one more system. If you
9 scroll down just one more, please. Thank you so
10 much.

11 System number 47, SMaRCS, the Sample,
12 Matching, Reviewing and Coding System. SMaRCS
13 is the system that is used to choose cases for
14 our quality control operations for nonresponse
15 follow-up. So when we see things like NRFU RI
16 or reinterview in reports and if documents,
17 those cases are selected by SMaRCS.

18 So it does send some information,
19 largely via field OCS, as it's kind of the route
20 that it takes. But it's relevant to the
21 conversations that we'll be having.

22 BY MS. ROBINSON:

23 Q. Thank you.

24 What do you mean by field OCS?

25 A. ECaSE FLD OCS. So if we scroll back up

40

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1 a couple. I don't remember the numbers of the
2 system.

3 Q. 24.

4 A. 24.

5 Q. Right. I'm sorry. Yes, the ECaSE.

6 A. And I will try really hard not to use
7 acronyms, but just remind me if I do.

8 Q. Thank you.

9 Any other systems we should cover that
10 feed into CDL?

11 MR. SVERDLOV: Objection, vague and compound.

12 THE WITNESS: For the purposes of what we're
13 likely to discuss today, those are the
14 highlights. We can discuss system number 26
15 ECaSE OCS. It sends the workloads so the
16 universes for each operation it sends to CDL and
17 so that will -- when we discuss things like
18 self-response, completion rates and response
19 rates, those come from a combination of ECaSE --
20 largely from ECaSE OCS.

21 BY MS. ROBINSON:

22 Q. Any other systems?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: Not that we are likely to

25 discuss today. If we get into a spot where we

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 start going -- where you need more information,

2 we can go through a specific system and how it

3 interacts.

4 BY MS. ROBINSON:

5 Q. Okay. Thank you.

6 A. You bet.

7 Q. As far as querying the data, coming up

8 with rates, is that done in CDL?

9 MR. SVERDLOV: Objection.

10 THE WITNESS: Yes.

11 MR. SVERDLOV: Objection, vague and compound.

12 BY MS. ROBINSON:

13 Q. Thank you. Can you describe how that's

14 done in CDL, please?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: So can we choose a particular

17 rate you want to discuss and we can talk about

18 how that one is done? Because I think that's a

19 -- it helps us get on a very concrete path.

20 BY MS. ROBINSON:

21 Q. Sure. Does CDL -- does CDL contain the
22 percentages of NRFU housing unit numbers
23 enumerated by proxy?

24 A. Right. So the way that happens is each
25 night after midnight a series of scripts are run

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1 within the CDL and it runs automatically there
2 is not a human that pushes a button every night
3 that uses a set of predefined criteria to
4 compute in this -- in this case something like
5 the number of -- let's go with number of NRFU
6 cases completed since it's reasonably
7 straightforward, right. If we want -- every
8 night CDL churns there is a series of scripts
9 and it computes at various levels, whatever
10 levels we specify the number of units that are
11 completed, let's say for an 8. We're all
12 interested in how ECASE EO is progressing. Once
13 those are precomputed, they're stored within
14 CDL. UTS accesses them and when a user wants to
15 see the data. It's available via the web
16 interface in UTS.

17 So precomputation happens in the Census
18 Data Lake and then it's displayed in UTS for
19 users to see.

20 Q. Okay. Understood. So reports are not
21 generated in CDL?

22 MR. SVERDLOV: Objection, vague.

23 THE WITNESS: The data that feed the reports
24 are generated in CDL. UTS then accesses that
25 data to display it to the user.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay. So?

3 A. Think of CDL and UTS as sister systems.
4 They work together to display data for us.

5 Q. Okay. Okay. That's helpful. So how
6 often is the data in CDL updated?

7 MR. SVERDLOV: Objection, vague.

8 THE WITNESS: The answer is it depends on the
9 data that we are talking about and at which
10 stage of processing we are discussing. So can
11 you choose a specific type of data that you are
12 interested in and I can describe how that works.

13 BY MS. ROBINSON:

14 Q. Yes how about the NRFU completion rates

15 to use your example?

16 A. I figure that was what you would pick.

17 So the public rates we display are a
18 different discussion. So let's talk about a
19 very specific component of it. Let's talk about
20 the number of NRFU cases that have been
21 completed.

22 So the data for those are sent as an --
23 as an enumerator transmits their data back so
24 that kind of happens in the background, field
25 OCS receives, it and sends it to CDL. CDL

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1 receives it as fast as it can transit each of
2 the systems that it has to go through, CDL
3 received that data. CDL then has a series of
4 processes that run multiple times during the day
5 to bring that data into the data lake. However
6 we don't create reports except once a day and we
7 do that overnight after midnight. And the
8 reason that we do that is that way each day we
9 can compare from day-to-day exactly the same
10 time period so that we're making our management
11 decisions based on the same amount of data. So
12 even though the data are updated more frequently

13 for that particular data source, we only compute
14 the reports once per day.

15 Q. Understood. And then that when you are
16 using those reports to do your comparison, are
17 you viewing that in CDL or in UTS?

18 A. Generally in UTS. The reports are
19 generally viewed in UTS. It's a -- it's
20 actually a very pleasant interface to use.

21 Q. User friendly?

22 A. So it's generally people use the
23 reports in UTS.

24 Q. Okay. That's helpful.

25 What divisions have access to the data

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 in CDL?

2 MR. SVERDLOV: Objection, foundation.

3 THE WITNESS: I can give you a list of -- a
4 noncomprehensive list if you'd like. If we want
5 a comprehensive list of every division, we would
6 need to provide that to you.

7 BY MS. ROBINSON:

8 Q. Understood. Whatever you are able to
9 tell me today would be helpful?

10 A. Okay. So the staff who administer CDL

11 and ADSD have access. The decennial statistical
12 studies division has access. Staff and the
13 research and methods directorate, staff in DMCD,
14 Decennial Census Management Division. I guess I
15 do, so staff who are in ADDC.

16 Q. Can you say what ADDC stands for?

17 A. Associate Director Decennial Census.

18 Q. Thank you.

19 A. No problem. I had to think hard on
20 that one. And I'm certain there is other
21 divisions but to do a comprehensive list we want
22 to make sure we get a list of -- the divisions
23 who actually do have access.

24 Q. Understood. Are there productivity
25 rates of enumerators in CDL?

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection, vague.

2 THE WITNESS: Is there a specific metric that
3 you -- that has been delivered that you want to
4 ask about in one of the slide decks.

5 BY MS. ROBINSON:

6 Q. Yes. I can get to that later if that
7 would be helpful to look at something specific?

8 A. It would, it would. I want to make

9 sure I answer the question correctly so that I
10 don't mislead you.

11 Q. Okay. Okay. Turning back to the
12 reports that are available in UTS?

13 A. Uh-huh.

14 Q. What are the format of the reports that
15 are disseminated via email?

16 MR. SVERDLOV: Objection, vague.

17 THE WITNESS: Yeah, when we get an email
18 that -- it's got very high level information in
19 it and it varies by operation. So it will
20 generally have some -- some numbers about
21 completion or cost or whatever the thing that's
22 been specified. And some slight graphics to
23 tell you the state of the operation at that
24 point.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Are they PDFs, excels?

3 A. Within the email it's simply an email
4 that HTML based email that we receive. If you
5 want more information, you have to log into the
6 UTS.

7 Q. Okay. So every one who is getting that
8 more granular information that is not available
9 in email has to log into UTS to view it?

10 MR. SVERDLOV: Hold on one second.

11 Objection, form.

12 THE WITNESS: So if you want to see the
13 original UTS report yourself then you log into
14 the UTS. What often happens is someone
15 downloads it you can download into an Excel
16 spreadsheet and that gets sent around via email.

17 BY MS. ROBINSON:

18 Q. Okay. So there is let's see two
19 different formats that are emailed around, the
20 HTML email plus Excel attachments?

21 MR. SVERDLOV: Objection, vague, compound,
22 and misleading.

23 THE WITNESS: Right. So there is a
24 predefined set of reports that go to a
25 predefined set of people that are emailed by the

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 UTS itself. And again this isn't a human that
2 emails it. The system itself sends out the an
3 email as it's programmed to do. Those are HTML
4 based reports that email receive each day.

5 However, often people will download
6 them and I believe you guys have been provided
7 with a very, very long document of lots and lots
8 of numbers. Many of those come from the UTS,
9 right. So we download perhaps combined with a
10 handful of other reports, whatever, and sends it
11 on. We reformat them for our bosses, that sort
12 of thing.

13 BY MS. ROBINSON:

14 Q. Okay. Can we flip to Exhibit 6,
15 please. This might be helpful?

16 TECHNICIAN WERT: And counsel just to clarify
17 you would like to mark this as Exhibit 6,
18 correct?

19 MS. ROBINSON: I'm sorry. If you could pull
20 up Exhibit 6. This can be marked as Exhibit 2.

21 TECHNICIAN WERT: Okay. One moment.
22 Counsel, I apologize. My screen froze real
23 quick. And while I do that, the chart we were
24 doing that I think you had referenced as
25 Exhibit 2. Did you want that marked as

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1 Exhibit 2?

2 MS. ROBINSON: Yes, thank you.

3 TECHNICIAN WERT: So this document Exhibit 6
4 will be marked as exhibit.

5 MS. ROBINSON: Three.

6 TECHNICIAN WERT: Exhibit 3. Thank you very
7 much.

8 MS. ROBINSON: Thank you.

9 MR. SVERDLOV: While we are waiting for the
10 exhibit to come up, we have been going for about
11 an hour so I think we would like to take a break
12 for a few minutes within the next opportunity.
13 While this is going on maybe we can take a break
14 now.

15 MS. ROBINSON: Sure, that's fine with me.

16 THE VIDEOGRAPHER: Okay. We are going off
17 the video record at 10:44.

18 (Whereupon, a recess was had at
19 10:44 a.m. after which the
20 deposition was resumed at
21 11:01 a.m. as follows:)

22 THE VIDEOGRAPHER: And we are back on the
23 video record at 11:00 a.m. Please continue.

24 BY MS. ROBINSON:

25 Q. Ms. Adams, on that break did you speak

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1 with anyone about the substance of your
2 testimony?

3 A. Only with Mr. Sverdlov.

4 Q. And what did you talk about with
5 Mr. Sverdlov?

6 MR. SVERDLOV: Objection. I will instruct
7 the witness not to answer about the details of
8 the conversation given that it is protected by
9 attorney-client privilege.

10 MS. ROBINSON: On what basis is it protected
11 by attorney-client privilege?

12 MR. SVERDLOV: I'm only instructing the
13 witness not to get into specifics. She can
14 discuss the general -- the general topics.

15 BY MS. ROBINSON:

16 Q. Okay. What topics were discussed with
17 Mr. Sverdlov on the break?

18 A. Largely that I need to slow down and
19 not speak so fast.

20 Q. Was anything of substance discussed?

21 A. About the things that I have said?

22 Q. Yes.

23 A. No, no.

24 Q. Were there any discussions of CDL?

25 A. No.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Were there any discussions of any other
2 databases?

3 A. No.

4 Q. Were there any discussions of what you
5 might testify to after the break?

6 A. No.

7 Q. Okay. If we could turn to Exhibit 6,
8 please.

9 TECHNICIAN WERT: On screen now marked as
10 Exhibit 3.

11 (Whereupon, Adams Deposition
12 Exhibit 3 was marked for
13 identification.)

14 MS. ROBINSON: Okay. And would you be able
15 to give Ms. Adams control of this exhibit so she
16 could scroll through it?

17 TECHNICIAN WERT: Absolutely. So Ms. Adams,
18 if you just click on the document on the screen
19 that will give you control of my keyboard and
20 mouse. You can zoom, scroll at your own pace.

21 THE WITNESS: Okay.

22 BY MS. ROBINSON:

23 Q. So is this document is very long. It's

24 605 pages. We will not go through every page.

25 A. Thank you.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. But can you -- can you tell me, is this
2 data generated from CDL?

3 MR. SVERDLOV: Objection, vague.

4 THE WITNESS: Which pieces of data?

5 BY MS. ROBINSON:

6 Q. Okay.

7 A. Can you clarify for me?

8 Q. Sure. Why don't you walk me through
9 the document, and my question is, where does the
10 data in this document come from?

11 MR. SVERDLOV: Object to form.

12 THE WITNESS: Okay. So there is 605 pages of
13 data here.

14 BY MS. ROBINSON:

15 Q. Sure.

16 A. Can you clarify which pieces you are
17 talking about?

18 Q. Yes. Let's start with page 1.

19 A. Okay.

20 Q. Where is this from?

21 A. All right. Let me blow it up so I can

22 see it.

23 Q. Uh-huh.

24 A. The data in this document come from the

25 CDL or data that -- the data in this table come

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 from the CDL.

2 Q. And does the table itself come from the

3 CDL?

4 MR. SVERDLOV: Objection.

5 THE WITNESS: It does not.

6 BY MS. ROBINSON:

7 Q. Where does the table itself come from?

8 A. The table itself is an Excel

9 spreadsheet.

10 Q. Is the Excel spreadsheet downloaded

11 from UTS?

12 A. Pieces of it are.

13 Q. Okay. So how does this Excel

14 spreadsheet get generated?

15 A. The various pieces of data that are

16 combined together are collated from either the

17 UTS or from special tabulations from CDL and are

18 then put into a spreadsheet together each

19 morning.

20 Q. Is this one of the reports from UTS
21 that we were talking about earlier or something
22 different?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: This spreadsheet is not -- you
25 don't just pick an item and download it from

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 UTS.

2 BY MS. ROBINSON:

3 Q. Okay. This gets -- this Excel
4 spreadsheet is generated every day?

5 A. During data collection, yes.

6 Q. Okay. And what system generates it?

7 MR. SVERDLOV: Objection, foundation.

8 THE WITNESS: So there isn't a system that
9 generates it.

10 BY MS. ROBINSON:

11 Q. Okay.

12 A. The data sources are combined into one
13 Excel spreadsheet.

14 Q. Okay. Who makes the Excel spreadsheet?

15 A. Staff in DCMD.

16 Q. What does DCMD stand for?

17 A. Decennial Census Management Division.

18 Q. Okay. So an individual pulls the data
19 from CDL and UTS every day to generate this
20 Excel?

21 A. Yes.

22 Q. Okay. Is it a specific individual in
23 DCMD who does this?

24 A. It is a staff that's charged with doing
25 that.

↑

55

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. The DCMD staff or something more
2 specific?

3 A. The DCMD NRFU staff.

4 Q. NRFU staff. Okay. How many people are
5 on the NRFU staff?

6 A. Something greater than three, but less
7 than 15.

8 Q. Thank you.

9 A. Yeah.

10 Q. And what is the DCMD NRFU staff's
11 general responsibility?

12 MR. SVERDLOV: Objection, vague.

13 THE WITNESS: Can you clarify, please?

14 BY MS. ROBINSON:

15 Q. Sure. What do they do? What are their

16 job duties?

17 A. They manage the NRFU operation from a
18 project management standpoint.

19 Q. Okay. Do these reports have a name?

20 MR. SVERDLOV: Objection, vague.

21 THE WITNESS: The page 1, right?

22 BY MS. ROBINSON:

23 Q. Uh-huh, yes. Yes, these Excels that
24 are populated by the NRFU staff.

25 A. They are the state-based completion

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 rates.

2 Q. Okay. Okay state-based completion
3 rates.

4 And who receives these Excels every
5 day?

6 MR. SVERDLOV: Objection, foundation.

7 THE WITNESS: An email list of -- a list of
8 people on an email thread.

9 BY MS. ROBINSON:

10 Q. Okay. Who is on that email list?

11 A. We'd have to get the definitive list
12 for you. It's generally those people who are
13 working on the nonresponse follow-up operation

14 at that point.

15 Q. Does management receive this
16 spreadsheet?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: Which component of management
19 or who specifically?

20 BY MS. ROBINSON:

21 Q. Anyone at the management level.

22 A. Yes.

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: Yeah, various managers receive
25 it.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay. Which managers are those?

3 A. Like I said before, we would have to
4 get you a definitive list.

5 Q. Does it go to a list serve or is it
6 individual people's addresses?

7 A. Individual people's addresses.

8 Q. Okay. Can you approximate about how
9 many people receive this?

10 A. Not well.

11 Q. Do you think it's upwards of 50?

12 A. I honestly don't know. We would have
13 to get a count for you.

14 Q. Okay. Do you know if Mr. Dillingham
15 receives this?

16 A. I do not. We would have to, again,
17 look at the list of people who were sent it each
18 day.

19 Q. Do you know if anyone outside the
20 Census Bureau receives this?

21 A. I do not know.

22 Q. Okay. So this data is by state,
23 correct?

24 A. Yes.

25 Q. Can it also be pulled by city?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection, form.

2 THE WITNESS: No, we did not do that.

3 BY MS. ROBINSON:

4 Q. But can this type of data be pulled at
5 the city level?

6 MR. SVERDLOV: Objection, form.

7 THE WITNESS: I'm thinking. Give me a
8 second.

9 I don't think so. There are -- and in

10 order to give a really great answer, remember,
11 I'm an statistician. Numbers matter very deeply
12 to me. There would have to be -- I don't know
13 that it could be done at the city level. I'd
14 have to have -- we'd have to have conversations
15 with people who are experts in each of these
16 components to determine if it could be done at
17 the city level.

18 BY MS. ROBINSON:

19 Q. Okay. Are the spreadsheets kept
20 somewhere?

21 MR. SVERDLOV: Objection, vague.

22 THE WITNESS: Yes. I mean, they are clearly
23 an email because we all got emailed them each
24 day. That would be, you know, an incredibly
25 easy way to get them.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 As for a single repository, yes.

2 BY MS. ROBINSON:

3 Q. Okay. And can you identify that
4 repository for me?

5 A. I can get the -- we can get the
6 specific location for you.

7 Q. Okay. Do you know if it's on a certain

8 drive shared location?

9 A. Like I said, we would have to get the
10 specific location for you.

11 Q. Okay. So just to make sure I
12 understand, if a person was looking for this
13 type of information at a more granular,
14 geographic level, whether that's ACO, tracked,
15 county, what would be possible to provide?

16 MR. SVERDLOV: Objection, vague and compound.

17 THE WITNESS: How do you mean?

18 BY MS. ROBINSON:

19 Q. How granularly could this data be
20 pulled by geography?

21 MR. SVERDLOV: Objection, vague.

22 THE WITNESS: I'd want to talk to -- like I
23 said, I would want to talk to the people who are
24 experts in each of these components to make sure
25 that there is not some nuance that I'm missing

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 on what level we could actually use.

2 BY MS. ROBINSON:

3 Q. And who are those people that are the
4 experts?

5 A. Likely people in DCMD who run each of

6 the operations.

7 Q. Okay. But you don't think that CDL
8 would have this data more granularly by
9 geography?

10 A. It -- it isn't a matter of whether CDL
11 has the data more granularly by geography. It
12 is that I would want -- before I answer a
13 question like that, I would want to make sure
14 there is not some nuance that I'm missing that
15 would cause us to have an inaccurate answer by
16 making the data very granular.

17 Q. Okay.

18 A. So it's not a matter of can we pull it.
19 It's more a matter of --

20 Q. Right.

21 A. -- is it appropriate to do so in order
22 to provide the best answer we can.

23 Q. What do you mean by appropriate to do
24 so?

25 A. Is there anything in combining these

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 data at a lower geography that would cause us to
2 provide an answer that's misleading or
3 incorrect.

4 Q. Okay. How would the answer be
5 misleading?

6 A. If we were to provide a -- an estimate
7 for a certain day and there was a -- the answer
8 is, I don't know and I would prefer to actually
9 give a very concrete definitive answer than to
10 make one up while we -- while we chat.

11 Q. Okay. Understood.

12 Picking one data field, self-response
13 in the NRFU universe, that's column H.

14 A. Yes.

15 Q. Does that data come from CDL?

16 A. Yes.

17 Q. And is that data maintained on a
18 tracked level?

19 A. These data aren't maintained at the
20 tracked level because we don't compute them that
21 way. Rather, CDL receives data. It's a lake.
22 A data lake merely has records of data. We then
23 choose what level we are going to compute it.
24 We've chosen the state level for this. So it's
25 computed at the state level. It can be computed

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 at other levels, should we so desire.

2 Q. So the data in column H could be
3 computed at the tracked level?

4 A. As far as I know, yes.

5 Q. Let's look at page 4, please.

6 A. Okay.

7 Q. Okay. So please tell me where -- how
8 these reports are generated.

9 MR. SVERDLOV: Objection, form.

10 THE WITNESS: Presume -- I think I got all
11 messed up here. One moment, please. There is a
12 very nice lag between me taking an action and
13 the document moving.

14 So for the document -- for page 4,
15 presumably it's an Excel spreadsheet.

16 BY MS. ROBINSON:

17 Q. Uh-huh.

18 A. I do not know the data source.

19 Q. Okay. Does this look like a UTS
20 download?

21 MR. SVERDLOV: Objection, calls for
22 speculation.

23 THE WITNESS: No.

24 BY MS. ROBINSON:

25 Q. Have you ever seen this type of report

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 before?

2 MR. SVERDLOV: Objection, vague.

3 THE WITNESS: Before late in the day,
4 yesterday, no, I don't think I've seen this one
5 before.

6 BY MS. ROBINSON:

7 Q. But you think you saw it late in the
8 day yesterday?

9 A. Yes.

10 Q. Okay. So you reviewed this in
11 preparation for the deposition?

12 A. Yes.

13 Q. Okay. So what can you tell me about
14 it?

15 MR. SVERDLOV: Objection, form.

16 THE WITNESS: Can you be more specific?

17 BY MS. ROBINSON:

18 Q. What system generates this spreadsheet?

19 A. I do not know. We'd have to go find
20 out what the -- pardon me, who the source of it
21 was and where they pulled the data from.

22 Q. Who receives this spreadsheet?

23 A. I do not know.

24 Q. How often is it generated?

25 A. I don't know. Again, we would have to

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 go find the person who generated it and how
2 frequently -- where they got the data.

3 Q. Okay. So you reviewed this document
4 yesterday. But you're not able to provide any
5 testimony about it?

6 MR. SVERDLOV: Objection, misleading.

7 THE WITNESS: I reviewed the 605 pages that
8 are in this document yesterday and we did not
9 discuss the source of the data for this
10 particular page.

11 BY MS. ROBINSON:

12 Q. Okay. Understood.

13 Let's flip to page 6.

14 A. I'm trying. I really am.

15 Q. Okay. So how is this spreadsheet
16 generated?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: Staff and field fill out each
19 column each day when they have updates.

20 BY MS. ROBINSON:

21 Q. What system do they use to provide
22 those updates?

23 A. So there is actually very little
24 system-generated data in here. The impetus of
25 this report are the RCC actions to the right.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. How does the text get inputted into the
2 table?

3 A. The various regional offices provide
4 the data to field headquarters.

5 Q. And field headquarters inputs the data
6 into a spreadsheet?

7 A. Yes.

8 Q. Is this an Excel spreadsheet?

9 A. Yes.

10 Q. And it's not maintained through a
11 database or system?

12 A. No.

13 Q. So there is a single Excel spreadsheet
14 that field management uses to enter the
15 information?

16 MR. SVERDLOV: Objection, misleading.

17 THE WITNESS: Yes.

18 BY MS. ROBINSON:

19 Q. Where is this Excel spreadsheet
20 maintained?

21 A. I don't know. We could find out for
22 you.

23 Q. Who views this spreadsheet?

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: Staff and field headquarters.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay. What's the name of this
3 spreadsheet?

4 MR. SVERDLOV: Objection. Assumes facts not
5 in evidence.

6 THE WITNESS: Oh, I don't know. It's an
7 exhibit here.

8 BY MS. ROBINSON:

9 Q. Okay. So it's an Excel spreadsheet
10 used by the field headquarters and staff. And
11 is there any other information you can tell me
12 about it?

13 MR. SVERDLOV: Objection, form.

14 THE WITNESS: How do you mean?

15 BY MS. ROBINSON:

16 Q. Does it get emailed out to anyone?

17 A. I don't know.

18 Q. How is it used by the field

19 headquarters?

20 MR. SVERDLOV: Objection. I'm going to
21 object to that question on the basis of scope
22 because it exceeds the scope of the topics
23 noticed for the deposition. And also --

24 MS. ROBINSON: I'm just asking. Sorry.
25 Please go ahead. I apologize.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: The specific substance of the
2 document, which is what we seem to be discussing
3 now, is far afield from the general topics that
4 have been noticed in the deposition. And so to
5 the extent the witness answers that question, it
6 will be in her personal -- personal knowledge
7 and personal capacity, not on behalf of the
8 Census Bureau.

9 MS. ROBINSON: Well, I disagree with that.
10 I'm just trying to get at the purpose of this
11 data spreadsheet, which is clearly in scope, but
12 we can put that dispute aside and I will ask
13 again.

14 BY MS. ROBINSON:

15 Q. What is the purpose of this
16 spreadsheet?

17 MR. SVERDLOV: Objection, vague and obviously
18 the same objection as before.

19 THE WITNESS: The purpose of the spreadsheet
20 is to track the actions we're taking for -- that
21 have been taken in ACOs where there is a reason
22 to track what they are doing, so in order to
23 make sure that we're managing our ACOs properly.

24 BY MS. ROBINSON:

25 Q. Okay. And can you be a little more

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 specific on when you said what the ACOs are
2 doing?

3 MR. SVERDLOV: Objection, form.

4 THE WITNESS: So in the column that says RCC
5 actions --

6 BY MS. ROBINSON:

7 Q. Yes.

8 A. -- there's updates about the management
9 actions they are taking each day.

10 Q. Uh-huh. Okay. Let's turn to page 17,
11 please.

12 TECHNICIAN WERT: Ms. Adams, I know there is
13 a lag, so if you need help from the technician
14 just navigating from one page to the next, let

15 me know.

16 THE WITNESS: Go for it.

17 MS. ROBINSON: That's fine. We can give the
18 control back. I thought it would be more
19 helpful for you to go back and forth. But let's
20 go with someone else.

21 TECHNICIAN WERT: You still have control but
22 you are on page 17 now.

23 BY MS. ROBINSON:

24 Q. Okay. Do you recognize this
25 spreadsheet?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. From my review yesterday, yes.

2 Q. Okay. Does it have a name?

3 A. I don't know.

4 Q. Okay. What system generates this
5 spreadsheet?

6 MR. SVERDLOV: Objection, vague.

7 THE WITNESS: It is not system generated.

8 BY MS. ROBINSON:

9 Q. Okay. Is this an Excel?

10 A. Yes.

11 Q. And how is the -- how does the Excel
12 get populated with information?

13 A. Staff would need to fill out each
14 field.

15 Q. And what staff fills out the fields?

16 A. Staff in the RCC, our field
17 headquarters.

18 Q. Okay. So this is another spreadsheet
19 used by field headquarters?

20 A. Yes.

21 Q. Okay. Are these spreadsheets kept in a
22 central repository?

23 A. I don't know.

24 Q. How often is this spreadsheet
25 generated?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. I don't know.

2 Q. Okay.

3 A. I can find those answers for you if you
4 would like. But I don't know them right now.

5 Q. If we could look at page 23, please.

6 Do you recognize this spreadsheet?

7 A. Yes.

8 Q. Is it generated from a system?

9 A. No.

10 Q. This is manually composed?

11 A. There is -- there is not a system that
12 has all of these pieces of data.

13 Q. So how is this document generated?

14 A. Someone generated it on the frequency
15 with which they wished to generate it.

16 Q. Is it an Excel?

17 A. Presumably, yes.

18 Q. Who generates this?

19 A. I don't know.

20 Q. Who uses this?

21 MR. SVERDLOV: Objection, vague.

22 THE WITNESS: I can't speak to who would use
23 it or who uses this in their daily lives.

24 BY MS. ROBINSON:

25 Q. Do you know who receives this document?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. These were provided by either Jamie
2 Christy or Al Fontinow. So either one of the
3 two of them.

4 Q. Provided to whom?

5 A. Counsel at DOC.

6 Q. Provided to counsel at DOC for this
7 litigation?

8 A. Yes.

9 Q. Okay. So if we wanted to know anything
10 about these reports, we should talk to
11 Mr. Christy or Mr. Fontinow?

12 A. Yes.

13 Q. Okay. Do you know what the goal column
14 refers to?

15 MR. SVERDLOV: Objection. I'm going to,
16 again, object on grounds of scope and because
17 that question is outside the scope of the topics
18 noticed for the deposition. The witness will
19 testify in her personal knowledge or capacity,
20 not on behalf of the Census Bureau.

21 MS. ROBINSON: Again, I reserve my same
22 objection which is it's clearly in scope. I'm
23 simply asking about the type of data that's
24 maintained by the Census Bureau. This is a
25 piece of data that's maintained by the Census

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Bureau and I would like to know what the goal
2 column means.

3 MR. SVERDLOV: I will just say that the
4 meaning of a column is the substance of the
5 document and that is not the topics that are
6 noticed in the deposition. But we can reserve

7 that and move on.

8 MS. ROBINSON: Yeah, because I'm not asking
9 what the significance of what the goal meant to
10 Mr. Fontinow, for example. I'm just asking from
11 a data perspective what over what gives you 2.9.
12 From a data perspective, what does goal refer
13 to.

14 MR. SVERDLOV: I maintain the objection.

15 BY MS. ROBINSON:

16 Q. Okay. Ms. Adams, please answer.

17 A. I don't know.

18 Q. Do you know what "off goal by" means?

19 A. No.

20 Q. And do you know what the number
21 "active" means?

22 A. No.

23 Q. Okay. Let's go to page 101, please.
24 Have you seen this report before?

25 A. Yes.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. How is it generated?

2 A. Can we scroll over a little bit,
3 please?

4 TECHNICIAN WERT: Sure. Ms. Adams, you

5 actually still have control if you want to
6 scroll over.

7 THE WITNESS: Go ahead and do it. Perfect.
8 Thank you.

9 Can you please reask your question?

10 BY MS. ROBINSON:

11 Q. Sure. How is this report generated?

12 A. It is a combination of data from UTS
13 and --

14 Q. I'm sorry, I thought you were still
15 answering the question.

16 A. No, I'm sorry I was waiting for you.

17 Q. Oh, I'm sorry. I thought you were
18 saying it's a combination of data from UTS
19 and --

20 A. Oh, I must have broken up. MOJO
21 Hermes.

22 Q. Okay. Is the spreadsheet itself
23 exported from UTS?

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: Yeah. I mean, I can't speak to

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 the mechanics of how whomever put it together
2 did that.

3 BY MS. ROBINSON:

4 Q. Okay. I'm a little confused then. So
5 you can scroll through. It's 400 pages long.
6 Is this a download from a system or is it
7 manually put together?

8 MR. SVERDLOV: Objection, vague.

9 THE WITNESS: Can you do me a favor and
10 scroll down for a little bit?

11 TECHNICIAN WERT: Sure.

12 BY MS. ROBINSON:

13 Q. It goes until page 500 -- let's see, I
14 have it here with me.

15 A. Don't go all the way to the bottom.
16 Just scroll for a little bit.

17 Q. It goes to 191 ^ ck all the way
18 through.

19 A. Okay. Hold on. Yeah. So while the --
20 it looks like it's many, many, many, many pages
21 long. It's a series of reports over days. So
22 it looks a little more daunting than I think it
23 is.

24 Q. Uh-huh. Okay. So what group maintains
25 this spreadsheet?

↑

1 A. To be honest, I don't know. We would
2 have to ask.

3 Q. Who would know?

4 A. Either Al Fontenow or Jamie Christy,
5 whomever this came from.

6 Q. Okay. Do you know what this
7 spreadsheet is used for?

8 MR. SVERDLOV: Objection. I'm going to
9 object based on scope again. And so same
10 instruction -- or same qualification that the
11 witness will answer not on behalf of the Census.

12 MS. ROBINSON: Same response.

13 BY MS. ROBINSON:

14 Q. Do you know what this spreadsheet is
15 used for?

16 A. Do I know what somebody used the
17 spreadsheet for? No.

18 Q. Do you know who receives this
19 spreadsheet on a regular basis?

20 A. No.

21 MR. SVERDLOV: Objection. Foundation.

22 BY MS. ROBINSON:

23 Q. Do you know if a spreadsheet like
24 this -- well, strike that. Let's move on.

25 So if we could go back to CDL, I

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 thought that the spreadsheets in this exhibit
2 were going to be good examples of CDL or UTS
3 spreadsheets, so that's why I turned to that.
4 So I thought it would be helpful in our
5 conversation to walk through this just to --
6 just so you know why I flipped to that and then
7 am going back. So that's the context.

8 A. Okay.

9 Q. Let's see. So turning back to CDL and
10 UTS, I have a few questions about whether
11 specific calculations can be done in those
12 databases.

13 A. Okay.

14 Q. Okay. So --

15 A. Yep.

16 Q. Could you calculate percentages of NRFU
17 housing unit numbers enumerated by proxy?

18 A. Yes.

19 Q. Okay. Can you calculate the unit
20 numbers enumerated by proxy but excluding vacant
21 and nonexisting housing?

22 A. Yes.

23 Q. Does that calculation occur in CDL?

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: It -- hold on. Let me think

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 for just a second.

2 BY MS. ROBINSON:

3 Q. Of course. Take your time.

4 A. Yes, it occurs within CDL with -- it
5 occurs in the CDL system with the data that is
6 in CDL.

7 Q. If you wanted to generate a report of
8 that data, would you generate that report out of
9 UTS?

10 A. No.

11 Q. Would you generate it from CDL?

12 A. Yes.

13 Q. Why couldn't you generate it from UTS?

14 A. UTS are predesignated reports, so if we
15 chose to have a report with exactly that, you
16 had a lot of things on there, right?

17 Q. Yes.

18 A. And then it could absolutely be done in
19 UTS.

20 Q. Okay.

21 A. However, we purpose -- CDL can be used

22 to generate reports, the aggregates for reports,
23 and it can also be used for ad hoc analyses.
24 That would be one of them.

25 Q. Understood. Okay.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 So UTS conceivably could be used, but
2 you'd have to come up with a whole report. So
3 it would just be more efficient to use CDL?

4 A. UTS we pre-specify.

5 Q. Right. But I'm thinking you could add
6 one more report where you prespecified some sort
7 of new calculation, right?

8 A. Sure. If that's the route we chose to
9 take, yes.

10 Q. Okay. But it would be quicker to query
11 that information directly from CDL?

12 A. Yes.

13 Q. Have you done that calculation?

14 MR. SVERDLOV: Objection, vague.

15 BY MS. ROBINSON:

16 Q. I can say it again. The NRFU housing
17 unit numbers and percentages enumerated by proxy
18 but excluding vacant and nonexistent housing.

19 MR. SVERDLOV: Same objection.

20 THE WITNESS: There are estimates of proxies.

21 We would need to look at definitions and what
22 has been done to determine if the vacant and do
23 not exists are excluded.

24 BY MS. ROBINSON:

25 Q. Okay. And by estimates of proxies,

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 what do you mean by that?

2 A. The calculations.

3 Q. Okay. So --

4 A. Sorry, I'm a statistician. I use
5 estimates a lot.

6 Q. Okay. So there are calculations of by
7 proxy in CDL; is that correct?

8 A. Uh-huh.

9 Q. And it's possible to exclude vacant and
10 nonexisting housing, correct?

11 A. Yes.

12 Q. But you are not sure if that's been
13 done?

14 A. Correct.

15 Q. Okay. Thank you.

16 How long -- if you wanted to run that
17 calculation, how long would it take to do so?

18 A. A day or two.

19 Q. Okay. What about NRFU housing unit
20 numbers and percentages enumerated by population
21 count only, is that possible to do in CDL?

22 A. Yes.

23 Q. Has that been done?

24 A. I don't know.

25 Q. Okay. Do you know if it's been done to

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 respond to any of the requests in this
2 litigation?

3 MR. SVERDLOV: Objection, vague.

4 THE WITNESS: I do not know -- I mean, I
5 don't know.

6 BY MS. ROBINSON:

7 Q. Yeah. Understood.

8 Okay. And how long would it take to
9 run that calculation?

10 A. The same. Each of these are kind of
11 several day sorts of things to ensure that they
12 are calculated properly.

13 Q. Okay. And to view that information --
14 and I apologize if I have asked this before, I'm
15 just trying to get a handle on all of this -- so

16 to view that information, you would generate a
17 report from CDL?

18 A. Can you define what you mean by report?
19 I want to make sure we don't mix up
20 terminologies.

21 Q. I thought you said that CDL itself -- I
22 know UTS has reports and they are the
23 predesignated ones. But I thought you said CDL
24 also has reports.

25 A. CDL is a data lake. It doesn't have

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 reports like you're thinking about it. You can
2 query things. You can create numbers. It
3 doesn't -- the things you put in front of me a
4 little bit ago in 605 pages, you don't just make
5 an Excel spreadsheet like that, right? You
6 query data and then you create a report out of
7 it.

8 So you might type a whole bunch of
9 computer code and then have numbers, and then I
10 would put it into some format that I could share
11 with others to report about.

12 Q. Right. Okay. And what is that format
13 that comes out of CDL so you can share with

14 others?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: It is up to the particular
17 person who is creating the code.

18 BY MS. ROBINSON:

19 Q. So you could -- it could be an Excel?

20 A. Yes.

21 Q. Okay. Is there a typical format that's
22 used to share the information from CDL?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: I agree that is vague. It
25 depends on the number being created and how a

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 particular data analyst is going to share it or
2 what's been requested of them.

3 BY MS. ROBINSON:

4 Q. Okay. I'll ask it this way. What are
5 the possibilities?

6 A. Okay.

7 Q. Excel?

8 A. Excel.

9 Q. What else is used?

10 A. CSV. CES data set. That's not an
11 exhaustive list, but that would be kind of the

12 big ways that one would create what you're
13 terming a report.

14 Q. Okay. Or what word should I use? I'll
15 ask it that way. A download?

16 MR. SVERDLOV: Objection, form.

17 THE WITNESS: It's fine. It's fine.

18 BY MS. ROBINSON:

19 Q. Okay. So it would take a couple of
20 days to generate an Excel of the NRFU
21 calculations we discussed earlier?

22 MR. SVERDLOV: Objection, vague.

23 THE WITNESS: Something of that nature, yes.

24 BY MS. ROBINSON:

25 Q. Thank you.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Could you do those calculations based
2 on an ACO level?

3 A. Yes.

4 Q. Could you do it based on a tracked
5 level?

6 A. As far as I know, yes, but with the
7 same condition that we talked about when we were
8 looking at the first page of the 605-page
9 document.

10 Q. Yes?

11 A. I want to make sure there's not some
12 nuance I'm missing.

13 Q. Yes. Okay. Understood.

14 What about at a city level?

15 A. The same idea. I would want to make
16 sure that, again, there is not some nuance that
17 I just -- that -- I don't understand and would
18 give you a misleading answer.

19 Q. Right. But you can do calculations by
20 city in the CDL?

21 MR. SVERDLOV: Objection, vague.

22 THE WITNESS: I don't know. I would have to
23 look at some very detailed data to figure out --
24 to determine.

25

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay. I'll ask it this way then.

3 A. No --

4 Q. What are -- withdrawing.

5 What are the geographic levels that are
6 in CDL?

7 MR. SVERDLOV: Objection, vague.

8 THE WITNESS: Yeah, like I said, I would have
9 to actually look to determine what data are in
10 there. I can't answer it without doing that.

11 BY MS. ROBINSON:

12 Q. Okay. Is there a document like a
13 manual that would list out that -- those fields?

14 A. There are -- there are documents called
15 ICDs, Inter Connection Control Documents, that
16 talk about the data that flow between systems.
17 One of those documents would have in it the data
18 that flowed between -- that flowed into CDL and
19 what kinds of fields are in it.

20 Q. Okay. And would you have to look at a
21 number of different ICDs for that information or
22 would a single ICD have that?

23 A. It's in many.

24 Q. So you would have to look at several to
25 piece it all together?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. Yes.

2 Q. Okay. Okay. Are there any reports in
3 UTS that provide the population count only
4 enumerations?

5 MR. SVERDLOV: Objection, vague.

6 THE WITNESS: I don't remember. I would have
7 to look at a list of the reports.

8 BY MS. ROBINSON:

9 Q. Okay.

10 A. I'm sorry.

11 Q. No, that's fine.

12 What about the -- are there UTS reports
13 that include the percentages enumerated by
14 proxy?

15 A. I believe there are, but, again, I
16 would want to confirm by looking at a list.

17 Q. Okay. What about by proxy excluding
18 vacant and nonexisting housing?

19 A. It's the same idea. I don't want to
20 give you information that's incorrect.

21 Q. What about NRFU percentage enumerated
22 using administrative records? Is that -- are
23 you able to calculate that in CDL?

24 A. So that question -- hold on. Let me
25 put together a really good answer for you.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Okay. Take your time.

2 A. Thank you. So we don't actually
3 enumerate people in administrative records as

4 we're doing the NRFU, right? That happens
5 during our post-processing as we gather all the
6 data from NRFU from internet self-response, from
7 paper returns. So that -- we wouldn't enumerate
8 a person by administrative records during NRFU.
9 That would come after our post-processing.

10 Q. Okay. And so what database would you
11 use to reflect the administrative record had
12 been used?

13 MR. SVERDLOV: Objection.

14 THE WITNESS: Not until DRF2, CUF or CEF
15 would that truly be available.

16 BY MS. ROBINSON:

17 Q. So which of the 52 systems would --

18 MR. SVERDLOV: Objection.

19 THE WITNESS: System-wise -- sorry about
20 that. I'm trying to behave. System wise it
21 would be DRPS.

22 BY MS. ROBINSON:

23 Q. Okay. Sorry. You said that and I
24 didn't realize that was one of these. DRPS, let
25 me just -- oh, okay. Great. Number 20. Okay.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Yeah, so on the administrative record

2 topic for one second, I had seen that PEARSIS
3 had mentioned administrative records in the
4 definition. Is that system used for this
5 purpose?

6 A. PEARSIS processes the data from
7 administrative records and then provides it to
8 DRPS to be used in the actual census
9 tabulations.

10 Q. Understood. Okay. And is PEARSIS
11 being used in this census?

12 A. Yes.

13 MR. SVERDLOV: Objection, vague.

14 BY MS. ROBINSON:

15 Q. Okay. Thank you.

16 So if we wanted to know how many units
17 were being counted through administrative
18 records, that would be a calculation from DRPS?

19 A. Yes.

20 Q. Okay. And so --

21 A. Specifically -- go ahead.

22 Q. Sorry, please.

23 A. No, you're good.

24 Q. You were going to say and specifically?

25 A. No, you first, you first.

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Okay. Well, I was going to ask you the
2 questions then about how the data from DRPS is
3 downloaded, what --

4 MR. SVERDLOV: Objection, form.

5 THE WITNESS: What do you mean? That one I
6 need some help with.

7 BY MS. ROBINSON:

8 Q. How did you get the information out of
9 the system so you can view it?

10 A. The DRPS produces data files. There is
11 not a reporting system from it or anything like
12 that. It's product our census data files.
13 Those files are on servers and you perform
14 calculations on those using computer code.

15 Q. Okay. You perform the calculations on
16 the files themselves or the data in DRPS?

17 A. Generally on the files that result from
18 DRPS.

19 Q. Okay.

20 A. And those we've referred to as DRF.
21 CUF, CEF.

22 Q. What do those stand for?

23 A. Decennial Response File, Census
24 Unedited File and Census Edited File. Sorry

25 about that. I try with the acronyms.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. That's okay. And so I'm sorry, what
2 was the first acronym? DRF?

3 A. Yes, Decennial Response File.

4 Q. Okay. And so is the DRF the first
5 stage and then there is certain metrics
6 performed and then it's the CUF?

7 A. Yeah, they're sequential in the order
8 that I listed.

9 Q. Okay. And so at what point is -- do
10 the administrative -- I'll start again.

11 At what point are the administrative
12 records reflected in that data?

13 MR. SVERDLOV: I'm sorry. Hold on one
14 second. I'm going to object to form.

15 You can go ahead.

16 THE WITNESS: I'm thinking.

17 BY MS. ROBINSON:

18 Q. Sure. Take your time.

19 A. I don't know which of those two or
20 which of those three. It is one of them and I
21 don't want to give you an incorrect answer.

22 Q. Okay. But in one of those three

23 files --

24 A. Yes.

25 Q. -- there would be a column indicating

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 that an administrative record was used --

2 A. Right.

3 Q. -- for (inaudible)?

4 A. I believe it is DRF1 but I'm not
5 certain.

6 Q. Okay. And has that occurred yet?

7 A. DRF1 is currently being produced.

8 Q. So would it be possible today to figure
9 out how many instances the administrative record
10 is being used?

11 MR. SVERDLOV: Objection, vague.

12 THE WITNESS: Preliminary estimates, yes, but
13 until all the census processes are actually done
14 and the data are ready for tabulation, you
15 wouldn't have a final estimate. You could only
16 have preliminaries.

17 BY MS. ROBINSON:

18 Q. And how would you pull that preliminary
19 data?

20 A. How do you mean?

21 Q. How would you find the answer?

22 A. Sorry. I don't understand.

23 Q. No, no, I'm sorry. And my questions
24 are -- this is not what I do for a living.

25 So if -- I understand that it would

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 just be preliminary. But --

2 A. Uh-huh.

3 Q. -- if you, today, were to figure out
4 how many times the administrative record was
5 used in the count, how would you go about doing
6 that? What system would you use?

7 A. We would have an analyst write some
8 computer code to perform an ad hoc tabulation to
9 do so --

10 Q. Okay.

11 A. -- on the -- on the files that DRPS
12 produces.

13 Q. Okay. DRPS is a system? Oh, yes,
14 that's number 20.

15 A. Decennial Response Processing System.

16 Q. Okay. And can you give me an estimate
17 how long it would take to write that code and do
18 that tabulation?

19 A. Again, several days in order to ensure
20 that the tabulations are done correctly.

21 Q. Okay. Thank you.

22 Are there -- in the DRPS data on
23 administrative records, are there divisions
24 between high quality and low quality?

25 MR. SVERDLOV: Objection, vague and

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 foundation.

2 THE WITNESS: Wait, could you ask that again,
3 please?

4 BY MS. ROBINSON:

5 Q. Sure. Are there divisions in the
6 administrative record data between high quality
7 and low quality?

8 MR. SVERDLOV: Same objections.

9 THE WITNESS: There is a -- yeah, sorry about
10 that. There are those that we deem acceptable
11 for use --

12 BY MS. ROBINSON:

13 Q. Okay.

14 A. At various points in the process.

15 Q. Uh-huh.

16 A. And that's how we make that. It's less

17 high quality, low quality as this is of
18 sufficient quality for us to use for a given
19 purpose.

20 Q. And is that data kept somewhere?

21 MR. SVERDLOV: Objection, vague.

22 BY MS. ROBINSON:

23 Q. The data that shows which ARs are of
24 sufficient quality to use and which ARs are not?

25 MR. SVERDLOV: Objection, form.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: Yes.

2 BY MS. ROBINSON:

3 Q. Is that in DRPS?

4 A. No.

5 Q. Where is that kept?

6 A. It would be kept in a combination of --

7 it would be in CAES and could have it may be in

8 PEARSIS. CAES is C-A-E-S.

9 Q. And then does DRPS only reflect the
10 administrative records that have been deemed
11 sufficiently acceptable?

12 A. Correct.

13 Q. Okay. And you think we would have to
14 query both PEARSIS and CAES to fine --

15 A. I believe --

16 Q. -- to fine the number -- that's fine --
17 to find the number of ARs that were deemed not
18 sufficiently acceptable?

19 MR. SVERDLOV: Objection, form.

20 THE WITNESS: Yeah, I believe so.

21 BY MS. ROBINSON:

22 Q. Okay. Do you know if a code would have
23 to be written to figure out that information in
24 PEARSIS and CAES?

25 A. I don't know, but presumably, yes.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Okay. And if that is the case, would
2 it take -- case, case -- would it take two to
3 three days in your estimation?

4 MR. SVERDLOV: Objection, calls for
5 speculation.

6 THE WITNESS: Something of that nature.

7 BY MS. ROBINSON:

8 Q. Okay. Thank you.

9 A. Multiple days, let's go with that.

10 Q. Yeah, understood.

11 So I have a couple more of these. NRFU
12 housing unit numbers and percentages missing

13 certain information such as name or date of
14 birth?

15 A. Okay.

16 Q. Is that information in CDL?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: It is.

19 BY MS. ROBINSON:

20 Q. Do you know if it's in any of the UTS
21 reports?

22 A. I don't believe it is.

23 Q. Okay. What about information regarding
24 total in-person household enumerations?

25 MR. SVERDLOV: Objection.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: Total in-person household. I'm
2 struggling a little bit with that one --

3 BY MS. ROBINSON:

4 Q. Okay.

5 A. -- and what you mean by it.

6 Q. So I would like to know if CDL could
7 provide a calculation of in-person household
8 enumerations versus enumerations by proxy?

9 MR. SVERDLOV: Objection, form.

10 THE WITNESS: Yeah, preliminary estimates,

11 yes.

12 BY MS. ROBINSON:

13 Q. Why would they be preliminary?

14 A. Because the census hasn't been the --
15 the census post processes haven't been run yet,
16 so you would only be able to tell for a given
17 operation how many were with household members
18 versus with a proxy. You wouldn't be able to
19 tell across the operations because the processes
20 haven't been done net.

21 BY MS. ROBINSON:

22 Q. Thank you.

23 And by operations do you mean different
24 geographic operations?

25 A. No, the census is composed of a series

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 of operations. Examples include internet
2 self-response, paper data capture, nonresponse
3 follow-up, update leave. So each of those is a
4 different way that people can submit their data.

5 Q. Okay. Could you do the calculation of
6 enumerations in person versus proxy for 2010 in
7 CDL?

8 A. No, no.

9 MR. SVERDLOV: Objection, vague.

10 THE REPORTER: Counsel, did you say

11 objection, vague.

12 MR. SVERDLOV: I did.

13 THE WITNESS: I'm trying, I promise.

14 BY MS. ROBINSON:

15 Q. You can answer. Why not?

16 A. CDL contains data from 2020.

17 BY MS. ROBINSON:

18 Q. Okay. Was CDL used in 2010?

19 A. No.

20 Q. Where is the data maintained for 2010?

21 MR. SVERDLOV: Objection, foundation.

22 THE WITNESS: In the census data warehouse.

23 BY MS. ROBINSON:

24 Q. Is that an archived system?

25 MR. SVERDLOV: Objection, vague.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: It's a -- yeah, so it's -- the

2 data are -- in the census data warehouse as part

3 of the research and methods directorate and our

4 stored in -- I'm thinking. Give me a second.

5 Yes, I know that they are in the census data

6 warehouse.

7 BY MS. ROBINSON:

8 Q. Okay. Can the census data warehouse be
9 queried?

10 A. Yes.

11 Q. Okay. Does the census data warehouse
12 keep the data at a similar level of granularity
13 as the CDL?

14 A. Yes.

15 Q. Is there any data related to the 2010
16 census that is not kept in the CDW?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: Yeah, it -- I -- what kind
19 of -- I need a little more --

20 BY MS. ROBINSON:

21 Q. Sure.

22 A. -- specifics on that one.

23 Q. Yeah, I understand.

24 So if we wanted to do comparisons of
25 some of the metrics we just discussed such as

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 proxy, proxy excluding vacant houses or
2 nonexistent addresses and compared those same
3 metrics to the ones from 2010, would all of the
4 2010 data be in the CDW?

5 MR. SVERDLOV: Objection, form.

6 THE WITNESS: To compare to final -- to
7 compare to final data, yes.

8 BY MS. ROBINSON:

9 Q. Okay.

10 A. If we're comparing to -- many of the
11 summary counts are in published assessments
12 already that we would refer back to.

13 Q. Okay. But do you know if a published
14 assessment includes for 2010 the number of
15 proxies excluding vacant or nonexisting
16 households?

17 A. Yes.

18 Q. There are published assessments that
19 have that metric?

20 A. Uh-huh. And not to cut you off, but
21 are we going to take a break here pretty soon?

22 MS. ROBINSON: We can take a break now if you
23 need one, yes. Yeah, I'm happy to.

24 THE WITNESS: If we need to finish a little
25 set, that's fine. But at some point we need to

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 take a little pause.

2 MS. ROBINSON: If you'd like a break now,

3 let's do it.

4 THE WITNESS: Great.

5 MS. ROBINSON: Yes, yes. Any time, please
6 ask me. I don't want to make this more painful.

7 THE WITNESS: It's not painful. Just we need
8 a break.

9 MS. ROBINSON: That's fine. Actually, it's
10 12:10. The time has flown. Should we take, you
11 know, 20 minutes for lunch or what makes sense?

12 THE WITNESS: That would be great.

13 MS. ROBINSON: Great. So we will go back on
14 at 12:30, sorry.

15 MR. SVERDLOV: One second. Could we take
16 half an hour? There is something I need to take
17 care of as well. And just come back at 12:40.

18 MS. ROBINSON: 12:40 it is. Sounds great.
19 Thank you both.

20 THE VIDEOGRAPHER: Okay. Going off the video
21 record at 12:11.

22 (Whereupon, a recess was had at
23 12:11 p.m. after which the
24 deposition was resumed at
25 12:50 p.m. as follows:)

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1 THE VIDEOGRAPHER: And we're back on the
2 record at 12:49. Please continue.

3 BY MS. ROBINSON:

4 Q. Great. Ms. Adams, did you talk to
5 anyone about the substance of your testimony
6 during that break?

7 A. No.

8 Q. So back to the 2010 data in the CDW, is
9 that maintained on a tracked level?

10 MR. SVERDLOV: Objection, vague.

11 THE WITNESS: What kind of information do you
12 want to know about the data? Can you clarify
13 for me.

14 BY MS. ROBINSON:

15 Q. Sure. For example. The proxy data,
16 how many households were enumerated by proxy?

17 A. The data there are the equivalent of
18 the Decennial Response Files, the CUF, the CEF.
19 So it would be maintained on a record-by-record
20 granularity.

21 Q. All right. Could you query the
22 database to figure out that statistic on a tract
23 basis?

24 A. Presumably, yes.

25 Q. Okay. Do you know if you would have to

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 write a script to query the database in that
2 way?

3 A. Yes, somebody would have to write code.

4 Q. Are there any reports that are
5 accessible from that CDW database?

6 A. No.

7 Q. And to download the information from
8 the CDW database, do you download it to an
9 Excel?

10 MR. SVERDLOV: Objection, vague.

11 THE WITNESS: Whomever writes the script
12 would create an output file such that it could
13 be used for whatever reporting purposes are
14 needed. Excel is one option; comma separated.

15 BY MS. ROBINSON:

16 Q. Great. Okay.

17 Turning back to the 2020 census and the
18 data available in the CDL, is it possible to
19 calculate the percentage of addresses in the
20 NRFU universe that were obtained during the
21 closeout phase?

22 A. It is actually not possible to do that
23 calculation in CDL.

24 Q. Could you do it in another database?

25 A. Yes.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Which one?

2 A. We would use MOJO Hermes to perform
3 that calculation on the field OCS data.

4 Q. And what is the field OCS?

5 A. Do you remember how -- when we talked
6 about the systems and there was ECaSE FLD OCS?

7 Q. Yes.

8 A. That.

9 Q. What does OCS stand for again?

10 A. Operational Control System.

11 Q. Okay. And if we wanted to know when
12 addresses were added to the master address file,
13 how would you figure that out?

14 MR. SVERDLOV: Objection, form.

15 THE WITNESS: Let me think for a second. So
16 we would ask geography division how many
17 addresses got added to the master address file
18 as a result of whatever process we cared about
19 that added addresses.

20 BY MS. ROBINSON:

21 Q. Can you give me an example of the

22 process?

23 MR. SVERDLOV: Objection, form.

24 THE WITNESS: That one I'm going to need a
25 little more clarification for, please.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. What I'm trying to ask is can you
3 figure out by date when an address is added to
4 the master address file?

5 A. So -- so -- yes. The answer to that is
6 yes, we can.

7 Q. Okay. And what system would you use to
8 do that?

9 A. I would use -- let's flip back to the
10 list of systems we had up.

11 Q. That's Exhibit 2. If someone can pull
12 that up.

13 A. System number 35, MAF/TIGER.

14 Q. Okay. Does MAF/TIGER also provide data
15 on how each address is enumerated?

16 MR. SVERDLOV: Objection, vague.

17 THE WITNESS: Yeah, can you ask me that a
18 little differently? I think I do need a little
19 clarification there.

20 BY MS. ROBINSON:

21 Q. Sure.

22 A. Thanks.

23 Q. Does MAF/TIGER reflect which addresses
24 were enumerated by proxy?

25 MR. SVERDLOV: Objection, vague.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: Yeah. No, it doesn't.

2 MAF/TIGER is a list of addresses.

3 BY MS. ROBINSON:

4 Q. Okay.

5 A. So it does not have that information
6 with it.

7 Q. It also has the date in which each
8 address was entered into the file; is that
9 right?

10 A. I would have to check specifically
11 which date it would carry with it and if we
12 would have to use a combination of data to
13 determine exactly what date addresses were
14 added.

15 Q. Okay. Understood.

16 What database would you use to
17 calculate the percent of addresses that were

18 unresolved after data collection concluded?

19 MR. SVERDLOV: Objection, speculation.

20 THE WITNESS: The data from DRPS. So what --
21 one of the later response files, the CUF or the
22 CEF.

23 MR. SVERDLOV: For the record, my objection
24 was to foundation. I think it didn't reflect
25 accurately in the live transcript.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. And does that DRPS file have a field or
3 column to indicate which addresses were
4 unresolved after data collection concluded?

5 A. I don't know that it has a specific
6 column to tell you this one is resolved or this
7 one is not resolved. It has information that
8 allows us to know that.

9 Q. What information is that?

10 A. To provide a list of fields I would
11 need to look at the specific fields that are in
12 each file.

13 Q. Could you give me a couple examples?

14 MR. SVERDLOV: Objection, vague.

15 THE WITNESS: Again, not without looking at

16 specifically what's -- what is in each file as
17 they're specified.

18 BY MS. ROBINSON:

19 Q. And what are the files?

20 A. The DRF-2, CUF and CEF.

21 Q. Right. Okay.

22 About how many fields do those
23 spreadsheets have or files have?

24 MR. SVERDLOV: Objection, vague.

25

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. You can answer.

3 A. We would want to look at the
4 documentation to provide a good answer.

5 Q. Can you provide me an approximation?
6 Is it more than a thousand?

7 A. I don't think so. But, again, I would
8 want to look at the documentation.

9 Q. Okay. Did you review those files
10 before the deposition?

11 A. No.

12 Q. Okay. Okay. Does the CDL calculate
13 the number and percent of NRFU addresses

14 enumerated as vacant housing units?

15 A. Yes.

16 Q. Okay. Does it calculate the number and
17 percent of NRFU vacant housing unit
18 enumerations -- I'm sorry. I've asked you this
19 about administrative records. We've already
20 been over that.

21 Does the CDL calculate the vacancy rate
22 based on the total number of occupied and vacant
23 addresses?

24 MR. SVERDLOV: Objection, form and
25 foundation.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: I'm not certain if it
2 calculates that exact rate. Again, I would want
3 to look at documentation to make certain I'm
4 telling you the right answer.

5 BY MS. ROBINSON:

6 Q. And the documentation you would look at
7 are the ICDs?

8 A. No. I would look at the requirements
9 for the UTS reports.

10 Q. Okay. But the CDL can do more
11 calculations than just what's reflected in the

12 UTS reports, correct?

13 MR. SVERDLOV: Objection, form and
14 foundation.

15 THE WITNESS: Someone can write scripts to
16 form additional calculations, yes.

17 BY MS. ROBINSON:

18 Q. Okay. I thought that the CDL could be
19 queried in ways other than how the UTS reports
20 are structured.

21 A. It can.

22 MR. SVERDLOV: Objection, form

23 BY MS. ROBINSON:

24 Q. Okay. So do you think the CDL could be
25 queried to determine the vacancy rate calculated

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 based on the total number of occupied and vacant
2 addresses?

3 A. Preliminary numbers, yes. But for
4 final answers, you have to wait until the
5 decennial post processing is done.

6 Q. Okay. Okay.

7 What about reinterview data, is that in
8 CDL?

9 MR. SVERDLOV: Objection, vague.

10 THE WITNESS: Yeah, I do need you to be a
11 little more specific about that, please.

12 BY MS. ROBINSON:

13 Q. Sure. Well, how -- I'll ask this.
14 What types of data is kept on the reinterview
15 process?

16 MR. SVERDLOV: Objection, foundation.

17 THE WITNESS: So it depends on which part of
18 the process that we're discussing. Can you be
19 really specific about kind of what you want to
20 know about?

21 BY MS. ROBINSON:

22 Q. Maybe you can walk me through the
23 processes. I'm interested in how they get
24 triggered and what the results are and where
25 that data is kept.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection. Form of the
2 question, vague and compound.

3 THE WITNESS: All right. Let's start with
4 how cases are triggered.

5 BY MS. ROBINSON:

6 Q. Okay.

7 A. Okay. A series of data goes from FOCS

8 to SMaRCS. These are two systems we talked
9 about before. And there is a series of tests
10 performed on those data to determine if it is --
11 if that case or that -- if that case is likely
12 to have issues or if a given enumerator is
13 likely to have issues.

14 It also uses administrative records in
15 a different -- we match the responses to
16 administrative records to determine if they are
17 likely to be falsified. And a series of checks
18 are performed largely using paradata. So that's
19 data about the interviewing process itself.

20 And if a case is likely enough to be
21 falsified, it is more likely to be selected for
22 a reinterview than if a case is not likely to
23 have been falsified or to have issues. They are
24 all about the selection process. Those data are
25 kept in SMaRCS.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 So I think the second part of your
2 question was about, what about the results of
3 noninterview -- sorry, reinterview.

4 Q. Of the reinterview.

5 A. So each case is sent out to the field

6 and the results of the reinterview are kept in
7 the same way that the results of any other NRFU
8 interview are kept. They come back to FOCS.
9 They are transmitted to CDL. They are also
10 transmitted to SMarCS.

11 The results in SMarCS are then
12 post-processed and if needed a clerk will review
13 the information to determine if there is any
14 sorts of problems with the original interview.
15 And if there are, they can suggest that -- that
16 that enumerator's work be failed. And all of
17 those data are kept within SMarCS.

18 Q. Okay. Thank you.

19 So --

20 A. Yep.

21 Q. And the data in SMarCS can be queried?

22 MR. SVERDLOV: Objection, vague.

23 THE WITNESS: The SMarCS data is stored in
24 an Oracle database so it can be queried as any
25 other Oracle database could.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. And you can export data from an Excel
3 into it?

4 A. If the data are summarized enough, yes.

5 Q. Could the re -- could the reinterviewed
6 data indicating which cases have been selected
7 for reinterview be exported into an Excel?

8 A. One second. I'm doing calculations in
9 my head. If you want record-by-record, it would
10 have to be put into many Excels. If you want
11 summary tabulations, then you would be okay.
12 How many --

13 Q. Would the summary tabulations be by
14 tract?

15 A. They can be.

16 Q. What program is used to assign the
17 enumerators their work?

18 MR. SVERDLOV: Objection, foundation.

19 THE WITNESS: Sorry, Alex.

20 MR. SVERDLOV: That was it. Thanks for
21 waiting. Objection, foundation. But I'll add a
22 form objection as well.

23 BY MS. ROBINSON:

24 Q. So you can answer. Yeah, sorry.

25 A. MOJO Route Optimizer.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Okay. Is that the MOJO Field

2 Processing or MOJO Optimizer Modeling?

3 A. MOJO Optimizer Modeling.

4 Q. Oh, that one is still in use. Okay.

5 MR. SVERDLOV: Objection, form.

6 BY MS. ROBINSON:

7 Q. Does MOJO Optimizer Modeling track the
8 enumerator's progress?

9 MR. SVERDLOV: Objection, vague.

10 THE WITNESS: Yeah. So I need you to ask
11 specifically what you mean by that.

12 BY MS. ROBINSON:

13 Q. Sure. Is the productivity of each
14 enumerator tracked?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: Not in the optimizer itself.

17 BY MS. ROBINSON:

18 Q. Where is it tracked?

19 A. The productivity -- so let me -- I do
20 need a lot of clarification on this.

21 Like which measure are you talking
22 about, which -- I want to make sure I give you
23 the right source information.

24 Q. So the Census Bureau has released
25 productivity rates.

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. Okay.

2 Q. Where does that -- where is that data
3 stored?

4 MR. SVERDLOV: Objection, vague and
5 foundation.

6 THE WITNESS: And I'm sorry to be pedantic
7 about this. I just want to make sure I give you
8 the right answer. Can you show me a source of
9 this data so -- so I can make sure that I tell
10 you right? As we saw, 605 pages of numbers flew
11 around. I want to make sure I get this right.

12 BY MS. ROBINSON:

13 Q. So I think I will in one of the
14 exhibits coming up. But I did think in the
15 beginning of the overview on CDL, you mentioned
16 that paradata such as productivity rates were
17 maintained in CDL.

18 MR. SVERDLOV: Objection, form. Go ahead.

19 THE WITNESS: I was going to say what I said
20 was paradata such as the enumerators' pay
21 records are stored there, not their
22 productivity. So the number of hours they work
23 are stored in CDL.

24 BY MS. ROBINSON:

25 Q. Okay. But if you wanted to know of

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 their assigned workload on a given day, how much
2 of it was completed, what database would you
3 look in?

4 MR. SVERDLOV: Objection, form and
5 foundation.

6 THE WITNESS: So let me repeat back to you.
7 Of the work they were assigned that day, how
8 much of it was completed?

9 BY MS. ROBINSON:

10 Q. Uh-huh.

11 A. Yes, you can look in CDL.

12 Q. Okay. Can you tell me what optimizer
13 data is?

14 A. I can tell you what the optimizer is.
15 I can tell you what data is. I'm not certain --
16 can you clarify what you mean by optimizer data?

17 Q. Yeah, or the optimizer software?

18 A. Okay. The optimizer software is a
19 piece of software that uses the enumerator's
20 home location. Special skills they may have
21 such as language, their ability to speak other
22 languages. The work that's available in their

23 area, the amount of time that they've said
24 they're available, the hours they say they are
25 available and a series of priorities given to

↑

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1 each case to determine the most optimal route,
2 not for that individual enumerator, but for the
3 group of enumerators in a given area.

4 Q. Okay. Does that software take into
5 account hard-to-count populations?

6 MR. SVERDLOV: Objection, vague.

7 THE WITNESS: Yeah, can you describe what
8 you -- not what you mean by hard-to-count
9 populations but by take into account?

10 BY MS. ROBINSON:

11 Q. Does it account for whether -- when the
12 optimizer is providing that route information,
13 is that determined or related to which
14 populations in the area are hard to count?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: The optimizer uses -- if the
17 enumerator speaks another language and if the
18 respondent has already said that they speak a
19 different language, it will match those up. It
20 does not take into account the -- any of the

21 hard to enumerate scores.

22 BY MS. ROBINSON:

23 Q. Uh-huh. Where are the

24 hard-to-enumerate scores or -- I'll rephrase.

25 What data system of the 52 uses the

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 hard-to-count scores?

2 MR. SVERDLOV: Objection, assumes facts not
3 in evidence.

4 THE WITNESS: I'm trying to think through
5 the list of where that would be used. And I
6 think to best satisfy that answer, it would
7 behoove us to actually provide some
8 documentation. Off the top of my head, I
9 couldn't tell you who uses it and who doesn't.

10 BY MS. ROBINSON:

11 Q. Okay. Do you know if it's in CDL?

12 A. Actually, I don't.

13 Q. Okay. Do you know if it's -- do you
14 know if it is in any UTS reports?

15 A. I don't know.

16 Q. Okay. What about Geo data, what
17 database is that kept in?

18 MR. SVERDLOV: Objection to form and

19 foundation.

20 THE WITNESS: I need a little help with what
21 you mean by Geo data.

22 BY MS. ROBINSON:

23 Q. My understanding is that -- well, I
24 think you said at the beginning that some of the
25 data that -- that CDL kept was data as far as

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1 where the enumerators were at all times so you
2 could tell how long an enumerator was standing
3 at someone's front door, for example.

4 A. Oh, okay.

5 MR. SVERDLOV: Objection, Foundation and
6 form.

7 BY MS. ROBINSON:

8 Q. Is that Geo data kept in CDL?

9 A. If it is not in CDL, it is in FOCS.

10 Q. Okay. So it might be in CDL?

11 A. Correct. Field by field I would want
12 to look at documentation before I answered you.

13 Q. Okay. And what is FOCS?

14 A. Field Operational Control System.

15 Q. Okay. I don't see that on the list.

16 A. ECaSE FLD OCS.

17 Q. Oh, ECaSE. Thank you.

18 A. I want to say it's like 20 something.

19 Q. Yes, ECaSE. Thank you.

20 Okay. I have a couple other questions
21 about the master address file and MAF/TIGER. Is
22 the DCF extracted from MAF/TIGER?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: DCF? Can you define?

25

↑

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1 BY MS. ROBINSON:

2 Q. The (inaudible) -- sure. It's the
3 control file, the decennial control file that
4 we've been talking about. Or DRF. I'm sorry.
5 DRF.

6 A. Okay.

7 Q. That's all the acronyms. Is the DRF an
8 extract from MAF/TIGER?

9 A. It is not an extract from MAF/TIGER.
10 It uses data from MAF/TIGER.

11 Q. Okay. Is the DRF an extract from a
12 system?

13 MR. SVERDLOV: Objection, vague.

14 THE WITNESS: The -- no. It's not an extract

15 from a single system.

16 BY MS. ROBINSON:

17 Q. Okay. What systems are used to compile
18 it?

19 MR. SVERDLOV: Objection, vague.

20 THE WITNESS: It uses data from MAF/TIGER,
21 CARDS, CDL, I believe PEARSIS, and we would want
22 to check documentation to make sure I didn't
23 miss anything else.

24 BY MS. ROBINSON:

25 Q. Okay. Thank you.

↑

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1 How are the -- I should ask it this
2 way. In the DRF, is every address listed?

3 MR. SVERDLOV: Objection, vague.

4 THE WITNESS: Yeah, that one I need a little
5 help with.

6 BY MS. ROBINSON:

7 Q. Sure. I'm trying to understand the
8 granularity of the DRF pile -- file. And I'm
9 wondering if it's based on an address-by-address
10 basis?

11 A. Yes, it is.

12 Q. Okay. And are any addresses not

13 included in that total file?

14 MR. SVERDLOV: Objection, vague.

15 THE WITNESS: Yeah, help me out a little bit
16 with that one, please.

17 BY MS. ROBINSON:

18 Q. Sure. So we -- certain addresses, if
19 they're determined to be vacant, for example,
20 are those still included in the DRF?

21 A. Yes.

22 Q. Okay. Is there any filtering out of
23 addresses that are considered not sufficient in
24 some way --

25 MR. SVERDLOV: Objection, vague.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. -- when completing the DRF?

3 MR. SVERDLOV: Objection, vague.

4 THE WITNESS: I need a little help with that,
5 please.

6 BY MS. ROBINSON:

7 Q. Sure. So we talked about when you were
8 doing administrative records that certain ones
9 were not sufficient to include. I'm wondering
10 if there is a similar quality check processes on

11 the addresses.

12 MR. SVERDLOV: Objection, vague.

13 THE WITNESS: As long as an address is in the
14 MAF, the decennial MAF, it's eligible to be
15 included in the DRF.

16 BY MS. ROBINSON:

17 Q. Okay. And you said eligible. But is
18 it -- are all of them included automatically?

19 A. Yeah, sorry.

20 Q. That's okay.

21 A. That was poor terminology on my part.

22 Q. I figured. Thanks.

23 Okay. A couple questions on SMarCS.

24 A. Sure.

25 Q. My understanding is that it applies

↑

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1 quality control algorithms?

2 A. Correct.

3 Q. What are those? Which ones does it
4 apply?

5 MR. SVERDLOV: Objection, compound.

6 THE WITNESS: Yeah I -- I do need that broken
7 down a little bit more, if you could.

8 BY MS. ROBINSON:

9 Q. Oh, I was just saying the same thing.

10 Which algorithms apply?

11 MR. SVERDLOV: Objection, vague.

12 THE WITNESS: In -- in what vein do you mean
13 which algorithms does it apply? As in --

14 BY MS. ROBINSON:

15 Q. Well, the document says that SMaRCS
16 applies quality control algorithms.

17 A. Can you get me back there so I can see
18 it?

19 Q. Yeah, yeah, we can switch back. That's
20 the description of what the database is, so I
21 was just reading that.

22 A. Okay.

23 Q. See number 47?

24 A. Yes.

25 Q. So which ones are those, which kind of

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 quality control is going on there?

2 MR. SVERDLOV: Objection, compound.

3 THE WITNESS: Did somebody say something?

4 MR. SVERDLOV: I objected.

5 BY MS. ROBINSON:

6 Q. But you can answer.

7 A. Okay. So we talked about SMaRCS
8 selecting cases, receiving the results and
9 performing a clerical match, right?

10 Q. Yes.

11 A. So when this is saying SMaRCS applies
12 quality control algorithms, that's what it's
13 talking about.

14 Q. Well, I remember the rereview process
15 but are there other quality control processes
16 that it performs?

17 MR. SVERDLOV: Objection, foundation.

18 THE WITNESS: So we enact our quality control
19 in NRFU by selecting cases for reinterview. So
20 when we say, you know, a reinterview case,
21 that's part of our quality control algorithms.

22 BY MS. ROBINSON:

23 Q. Yep.

24 A. Right? So when we discussed that
25 SMaRCS uses things like administrative records

↑

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1 and paradata to determine cases more likely to
2 be falsified and then selects those for
3 reinterview, and then receives the data so that
4 it can compare the original interview to the

5 reinterview, all of those things we talked about
6 are the quality control algorithms that SMarCS
7 applies.

8 Q. Okay. Understood. Are there any
9 others besides that process?

10 A. Are we talking about nonresponse
11 follow-up or are we talking about address
12 canvassing?

13 Q. Let's start with address canvassing.

14 A. So for address canvassing, the --
15 rather than interviewing an individual house,
16 the lister canvasses a block and makes updates
17 to the address list.

18 So, similarly, SMarCS receives the data
19 from, in this case LiMA, about the individual
20 blocks that have been canvassed and performs a
21 series of tests to determine if that block is
22 likely to have been falsified -- to have lower
23 quality work.

24 Q. Okay.

25 A. And then selects cases for QC work, for

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1 quality control work that are based on the
2 results of those tests.

3 Q. Okay. And what about for NRFU, what is
4 done on that?

5 MR. SVERDLOV: Objection.

6 THE WITNESS: For NRFU it's a very similar
7 process but we already went through that one.

8 MR. SVERDLOV: I'm sorry, I'm going to put an
9 objection. I don't mean to interrupt. I'm
10 going to object to form on that.

11 BY MS. ROBINSON:

12 Q. Could you please explain what the
13 quality control process is for NRFU that's in
14 SMarCS?

15 MR. SVERDLOF: Objection, foundation.

16 THE WITNESS: So like we discussed, SMarCS
17 receives data from FOCS about the original
18 interview. It -- there is a match to
19 administrative records that uses the paradata to
20 determine if the case is likely to have lower
21 quality results or be falsified, and then it
22 selects cases more likely to be falsified more
23 frequently.

24 Those cases -- and that generates a
25 reinterview case. The case is reinterviewed in

↑

1 the field. It comes back to SMarCS. SMarCS
2 compares the two interviews, the original
3 interview and the reinterview. And if there are
4 issues, it goes to a clerk who can recommend
5 that there were problems with that case or with
6 that enumerator, and if action needs to be taken
7 on those -- that enumerator.

8 BY MS. ROBINSON:

9 Q. Okay. Is the decennial directorate the
10 division responsible for maintaining all the
11 data and systems that support the census?

12 MR. SVERDLOV: Objection, foundation.

13 THE WITNESS: Sorry, I think I need a little
14 bit of help with that one.

15 BY MS. ROBINSON:

16 Q. What's the group that's responsible --
17 I'm sorry, just trying to get a sense of which
18 group or division is responsible for all these
19 data and data systems and databases.

20 MR. SVERDLOV: Objection, vague and compound
21 and form.

22 THE WITNESS: So the decennial directorate is
23 responsible for what each system is going to do.
24 Some of the systems lie within the decennial
25 directorate and are part of the organization

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 that is the decennial directorate. Some of the
2 systems are outside of the decennial directorate
3 and live elsewhere. They are used either --
4 they are in a variety of places throughout the
5 Bureau.

6 BY MS. ROBINSON:

7 Q. Okay. Thank you. Is the CDL in the
8 decennial directorate?

9 A. No.

10 Q. Okay. Is UTS?

11 A. No.

12 Q. Where is the CDL housed?

13 A. ADSD.

14 Q. Would you mind telling me what that
15 stands for? And apologies if you have already
16 done that.

17 A. Hold on. I got to think hard.

18 Q. We can also look it up.

19 A. Yeah. It's Application something
20 something Division.

21 Q. Okay. And where is the UTS housed?

22 A. Same place, ADSD.

23 Q. Great.

24 A. Now, we should be very clear, it's
25 organizationally housed there.

↑

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1 Q. Yes.

2 A. The actual infrastructure and data are
3 housed as part of the -- one of the decennial
4 contracts.

5 Q. Okay. Thank you.

6 Could we look at Exhibit 3, please.

7 TECHNICIAN WERT: Sure. And, Counsel, to
8 clarify, is that the document that we marked as
9 Exhibit 3 or the file name Exhibit 3?

10 MS. ROBINSON: The file name Exhibit 3,
11 please.

12 TECHNICIAN WERT: Sure. Stand by one moment.
13 And we will mark this as Exhibit 4; is that
14 correct?

15 MS. ROBINSON: Yes.

16 (Whereupon, Adams Deposition
17 Exhibit 4 was marked for
18 identification.)

19 MS. ROBINSON: That sounds right. So could
20 you scroll down so Ms. Adams can see the whole
21 document. I think maybe the bottom might be

22 helpful. Great. And then back up to the first
23 page.

24 BY MS. ROBINSON:

25 Q. Have you seen this document before?

↑

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1 A. Yes.

2 Q. Okay. Can you tell me what database is
3 used to generate the data in the three columns?

4 MR. SVERDLOV: Objection, assumes facts not
5 in evidence.

6 THE WITNESS: It is generated from page 1 of
7 the 605 page document that you showed me
8 earlier.

9 BY MS. ROBINSON:

10 Q. I'm sorry, can you be more clear? What
11 is -- it's generated -- it's not generated from
12 a system?

13 MR. SVERDLOV: Objection, form.

14 THE WITNESS: It is -- it comes from the
15 spreadsheet we talked through earlier.

16 BY MS. ROBINSON:

17 Q. And who maintains that spreadsheet?

18 A. DCM NRFU.

19 Q. Okay. How are calculations like these

20 run on that spreadsheet?

21 MR. SVERDLOV: Objection, vague and assumes
22 facts not in evidence.

23 THE WITNESS: So each of the columns -- each
24 of the pieces of source data are taken from UTS
25 reports, special tabulations from CDL. They are

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 put into that spreadsheet and then the numbers
2 that we see here are generated from that
3 spreadsheet.

4 BY MS. ROBINSON:

5 Q. Okay. So the data is from UTS and CDL.
6 It goes in to the NRFU staff spreadsheet?

7 A. Yes.

8 Q. And then the NRFU staff spreadsheet is
9 used to calculate the numbers on this page?

10 A. Yes.

11 Q. Okay. Thank you. Very helpful.

12 A. You bet.

13 Q. Would -- how often is a document like
14 this created?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: Yeah, could you -- could you be
17 a little more specific?

18 BY MS. ROBINSON:

19 Q. Sure. So this document says report
20 date, 9/29/20. Are these reports generated
21 every day?

22 A. Yes.

23 Q. Okay. And who generates them?

24 A. DCMD NRFU staff.

25 Q. Are they always on a state level or are

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1 they done at a more granular geographic level?

2 MR. SVERDLOV: Objection, compound.

3 THE WITNESS: State.

4 BY MS. ROBINSON:

5 Q. Who receives these documents?

6 MR. SVERDLOV: Objection, vague and assumes
7 facts not in evidence.

8 THE WITNESS: Like we talked about with the
9 spreadsheet before, we need to look to determine
10 who was on that "to" list. And this document is
11 available to the public.

12 BY MS. ROBINSON:

13 Q. Uh-huh. Okay. Are these reports
14 maintained in a central repository?

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: Yeah. I mean, they were in
17 email for sure and they are maintained in a
18 repository. And like we talked about before,
19 we'd have to find out the exact name for you.

20 BY MS. ROBINSON:

21 Q. Okay. Thanks. Could we turn to the
22 file name that's called Exhibit 4, please.

23 TECHNICIAN WERT: Sure. Stand by one moment.
24 And, Counsel, are we marking this as Exhibit 5?

25 MS. ROBINSON: Yes.

↑

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1 (Whereupon, Adams Deposition
2 Exhibit 5 was marked for
3 identification.)

4 BY MS. ROBINSON:

5 Q. So this is a declaration from
6 Mr. Christy. And if we could turn the page,
7 please, I would like to direct your attention to
8 paragraph four.

9 A. Okay.

10 Q. The second sentence I'll just read it
11 if that's okay. It says, "As of 8:21 p.m.
12 Mountain on October 2, 2020, this census field
13 supervisor area was 95.63 percent complete."

14 A. Okay.

15 Q. So what database reflects the
16 completion percentages in a given census field
17 supervisor area?

18 MR. SVERDLOV: I'm going to -- I'm going to
19 object on the basis of foundation and also to
20 the extent that the questions concern a document
21 that is the statement of Mr. Christy. I'm going
22 to object on the basis of scope such that the --
23 scope of the notice such that the witness would
24 be testifying in her personal knowledge, not on
25 behalf of the Census Bureau.

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1 MS. ROBINSON: And I will renew my response.
2 This is squarely from the scope of the notice.
3 Obviously the Census Bureau has the data in its
4 possession that allowed it to make -- that
5 allowed, excuse me, Mr. Christy to make a
6 statement that a census field supervise area was
7 95.63 percent complete on a certain day at a
8 certain time and the scope of the notice
9 provides that we are here to find out what that
10 data is and where it resides.

11 MR. SVERDLOV: I don't intend to take up your

12 time with arguments about the scope. So I have
13 noted my objection for the record.

14 MS. ROBINSON: Yes.

15 MR. SVERDLOV: And that's what it is.

16 MS. ROBINSON: Noted.

17 BY MS. ROBINSON:

18 Q. Okay. If you can please answer the
19 question.

20 A. MOJO Hermes.

21 Q. Okay. Thank you.

22 So MOJO Hermes reflects this rate by
23 census field supervisor area. Does it also
24 reflect this rate by city?

25 A. No.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Does it reflect the rate by tract?

2 A. No.

3 Q. Does it reflect the rate by state?

4 A. No.

5 Q. Okay. Okay. If I could direct your
6 attention to paragraph seven which is on the
7 next page of this document, please.

8 He says -- Mr. Christy says, I'll just
9 read it here, "that he pulled the metrics on

10 various case completion rates to determine
11 whether there were significant differences in
12 the manner for which cases were completed in the
13 CFS area." And then he discusses the completion
14 rates per the CFS area.

15 Is this data also kept in MOJO Hermes?

16 MR. SVERDLOV: I'm going to -- I'm going to
17 renew my objection as to scope.

18 MS. ROBINSON: Okay. Noted.

19 THE WITNESS: Yes.

20 BY MS. ROBINSON:

21 Q. Okay. Is there a field completed cases
22 per attempt in MOJO Hermes?

23 A. Yes.

24 Q. Okay. Is this the same -- does
25 completed cases per attempt mean the same thing

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 as closure rates?

2 MR. SVERDLOV: Objection, vague and compound.

3 THE WITNESS: Could you please define closure
4 rates for me.

5 BY MS. ROBINSON:

6 Q. Sure. So it's -- well, a live -- let's
7 sure, I'm not sure if it's in this document.

8 But we talk about completion rates and closure
9 rates that the Census Bureau does.

10 And so my question is whether
11 completion rates is the same as completed cases
12 per attempt?

13 A. No.

14 MR. SVERDLOV: Objection, form.

15 BY MS. ROBINSON:

16 Q. And there was another field in MOJO
17 Hermes called completed cases per hour?

18 A. Yes.

19 Q. And that metric is kept on a CFS area
20 basis?

21 A. Yes.

22 Q. And is that updated every day?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: It's updated approximately --
25 so, yes.

↑

135

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Okay.

3 A. While you flip, can we take just a
4 couple minute break, please?

5 MS. ROBINSON: Of course, of course. Be back

6 at 1:45.

7 THE WITNESS: Perfect.

8 THE VIDEOGRAPHER: Going off the record at
9 1:40.

10 (Whereupon, a recess was had at
11 1:40 p.m., after which the
12 deposition was resumed at
13 1:47 p.m. as follows:)

14 THE VIDEOGRAPHER: And we are back on the
15 record at 1:47.

16 BY MS. ROBINSON:

17 Q. Thank you. If we could please pull up
18 Exhibit 7.

19 TECHNICIAN WERT: Sure, stand by. It is on
20 screen now. And, Counsel, this will be marked
21 as Exhibit 6, correct?

22 (Whereupon, Adams Deposition
23 Exhibit 6 was marked for
24 identification.)

25 MS. ROBINSON: Yes. Thank you.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 TECHNICIAN WERT: Thank you.

2 BY MS. ROBINSON:

3 Q. Ms. Adams, have you seen this document

4 before?

5 A. Yes.

6 Q. Okay. I would like to understand a
7 little bit how the metrics on this page are
8 calculated. What data --

9 A. Okay.

10 Q. What data is used to calculate the
11 metric that 99.9 percent of addresses nationwide
12 were accounted for in the 2020 census?

13 MR. SVERDLOV: Objection, vague.

14 THE WITNESS: Like the exhibit we just talked
15 about that looks kind of like this one, the same
16 spreadsheet on the 650 page document is where
17 these come from. Those, in turn, are calculated
18 from feeder data from CDL and UTS.

19 BY MS. ROBINSON:

20 Q. Okay. And do you know what field is
21 used to determine how many addresses have been
22 accounted for?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: Yeah, the -- what do you mean
25 by which field?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Well, there is a numerator and
3 denominator to make this calculation. And I'm
4 wondering what field or column is used for the
5 numerator and the numerator is described as
6 addresses nationwide that have been accounted
7 for?

8 MR. SVERDLOV: Objection, form.

9 THE WITNESS: So there isn't one single field
10 that says, yes, this is done or, no, this isn't.
11 It's not quite that straightforward. It's based
12 on whether a given address in our census
13 universe has provided a response in an operation
14 in which -- in which it was included.

15 So it would be disingenuous of me to
16 say that there is a field; rather has that
17 address been responded in any operation.

18 BY MS. ROBINSON:

19 Q. Yes. Okay. And is that data that
20 feeds into that being pulled from CDL?

21 A. Yes.

22 Q. Great. Do you know which fields in CDL
23 are being queried to come up with that number?

24 MR. SVERDLOV: Objection, vague.

25 THE WITNESS: Yeah. There -- it's not just

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 one or two fields. And so we need to go
2 through -- we need to go through the
3 documentation to determine exactly which fields
4 are included here.

5 BY MS. ROBINSON:

6 Q. Okay. Looking down the page, there is
7 a sentence that's bolded at the beginning of the
8 third paragraph that says, "As of October 16th,
9 approximately 24.1 percent of occupied housing
10 units in the NRFU workload have been enumerated
11 by proxy response."

12 How is that percent derived?

13 MR. SVERDLOV: Objection, vague and compound.
14 And I'm also going to renew my scope objection.
15 Scope objection.

16 BY MS. ROBINSON:

17 Q. You can answer.

18 A. Based on data from the CDL.

19 Q. The sentence also says that the percent
20 is similar to the 2010 rate. Is that
21 information pulled from the CDW?

22 MR. SVERDLOV: Objection -- same objection as
23 before.

24 THE WITNESS: No. It would have been in a

25 2010 -- the 2010 NRFU assessment.

↑

139

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Is the 2010 NRFU assessment a document?

3 A. Yes.

4 Q. Is it a PDF?

5 A. I believe so.

6 Q. Do you know where it's maintained?

7 A. You can find it on the internet.

8 Q. Okay. Is the data in that assessment

9 pulled from the CDW?

10 A. I would have to --

11 MR. SVERDLOV: Objection.

12 THE WITNESS: Sorry, Alex.

13 MR. SVERDLOV: Objection, vague. Continue.

14 THE WITNESS: I'd have to look at the 2010

15 assessment to see the source data that they used

16 then.

17 BY MS. ROBINSON:

18 Q. Okay. The next paragraph down states

19 that "5.6 percent of addresses nationwide have

20 been completed using high quality administrative

21 records, which is 13.9 percent of the NRFU

22 workload."

23 What data would have been used to
24 calculate that percentage?

25 MR. SVERDLOV: Same set of objections as

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 before.

2 THE WITNESS: Yeah, I'm not certain. I would
3 have to go back and ask the people who wrote
4 this where they drew their source data from.

5 BY MS. ROBINSON:

6 Q. Okay. Do you know if there is a
7 database that reflects the number of high
8 quality administrative records used for
9 completion?

10 MR. SVERDLOV: Objection -- I'm sorry. I
11 didn't mean to interrupt you.

12 MS. ROBINSON: Sorry.

13 MR. SVERDLOV: Objection, compound.

14 MS. ROBINSON: Should I repeat it?

15 MR. SVERDLOV: Yeah. Yeah, we can do that.

16 Let's try it again.

17 BY MS. ROBINSON:

18 Q. So my question is, do you know if there
19 is a database that stores the number of high
20 quality administrative records that has been

21 used for completion?

22 MR. SVERDLOV: Okay. So objection, vague and
23 compound.

24 BY MS. ROBINSON:

25 Q. You may answer.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. Yeah. Well mI do need clarification
2 because it --

3 Q. Sure,

4 A. -- it actually is compound.

5 Q. I'm just reading the sentence. It's
6 providing a calculation, --

7 A. Okay.

8 Q. -- of the percent of addresses that
9 have been completed using high quality
10 administrative records.

11 So I'm just asking if you know of any
12 database that contains data related to the
13 number of high quality administrative records
14 used for completion.

15 MR. SVERDLOV: Objection, vague.

16 THE WITNESS: So the answer I would give is,
17 yes. However, I don't know the source of this
18 particular number and I would want to find out

19 what that source is before I say definitively
20 where it came from.

21 BY MS. ROBINSON:

22 Q. Well, can you please provide your best
23 guess then?

24 MR. SVERDLOV: Objection. Calls for
25 speculation.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: All right. It is either CDL or
2 CAES and I don't know which of the two they
3 pulled this from.

4 BY MS. ROBINSON:

5 Q. Okay. But CDL and CAES reflect data
6 regarding administrative records?

7 MR. SVERDLOV: Objection, form and
8 foundation.

9 THE WITNESS: Yeah, I mean, I think -- like I
10 said, the best answer would come from if we
11 could go find the correct answer rather than me
12 speculating. There is one of two places that
13 this number could have been derived from and I
14 actually would like to be able to find out where
15 that is instead of guessing. I don't know that
16 that's necessarily appropriate.

17 BY MS. ROBINSON:

18 Q. If we could move on to Exhibit 8,
19 please.

20 TECHNICIAN WERT: Stand by one moment. And,
21 Counsel, this will be marked as Exhibit 7,
22 correct?

23 MS. ROBINSON: Yes.

24 (Whereupon, Adams Deposition
25 Exhibit 7 was marked for

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

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1 identification.)

2 BY MS. ROBINSON:

3 Q. So this is a transcript of the -- a
4 news briefing by the Census Bureau.

5 A. Okay.

6 Q. I would like to turn to page 7. But
7 certainly if you need to read any of it, let me
8 know. But if you could scroll to page 7.
9 Great.

10 So, yeah, in that last paragraph there
11 that has the yellow highlighting, the first
12 sentence says, "Were able to achieve a numerator
13 productivity number of 1.92 cases per hour
14 versus a 2010 number of 1.01 cases per hour."

15 Do you know what databases or systems
16 would be used to derive those numbers?

17 MR. SVERDLOV: Objection, foundation, form
18 and scope. And after -- after witness answers I
19 think it might be appropriate to have maybe an
20 off-the-record conversation between counsel.

21 MS. ROBINSON: Sure.

22 THE WITNESS: Yeah. So the 1.92, the
23 numerator productivity number of 1.92 came from
24 MOJO Hermes. The 2010 number would have come
25 from 2010 assessments.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Is that the 2010 NRFU assessment
3 document you referred to?

4 A. Yes.

5 Q. Okay.

6 MS. ROBINSON: Okay. We can go off the
7 record, Mr. Sverdlov, if you want to.

8 MR. SVERDLOV: Yes, please. Just for a
9 minute.

10 THE VIDEOGRAPHER: Going off the record at
11 1:59.

12 (Whereupon, a recess was had at

13 1:59 p.m. after which the
14 deposition was resumed at
15 2:03 p.m. as follows:)

16 THE VIDEOGRAPHER: We are back on the video
17 record at 2:03.

18 BY MS. ROBINSON:

19 Q. If we could pull up, please, the same
20 exhibit.

21 Okay. On the next page, page 8,
22 please, there is a sentence in the middle,
23 there's a paragraph that says some of the
24 questions. And if you could maybe make it just
25 a tiny bit bigger for Ms. Adams. It's quite

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 small. Perfect. Great.

2 So it's that 24.1 percent, just direct
3 your attention. But the statement says, "As of
4 October 16th when we completed field operations,
5 approximately 24.1 percent of all enumerated
6 occupied housing units were enumerated using
7 information from a proxy."

8 So would data regarding how many
9 enumerated occupied housing units were
10 enumerated using information from a proxy be

11 found in the CDL?

12 A. Yes.

13 Q. Would it be found in any other
14 databases?

15 A. You can also calculate it from FOCS,
16 the Field Operational Control System.

17 Q. Great. Thank you.

18 A. Yeah.

19 Q. The next sentence provides a
20 23.8 percent final proxy number in the 2010
21 census.

22 A. Uh-huh.

23 Q. Are final proxy numbers from the 2010
24 census reflected in the 2010 NRFU assessment
25 document?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. Yes. It should be.

2 Q. Okay. Thank you.

3 A. Yep, you bet.

4 Q. The top of the next page, please.

5 This statement at the very top, once
6 again, addresses how many have been -- how many
7 addresses have been completed using high quality
8 administrative records.

9 Do you know where that data would be
10 kept?

11 MR. SVERDLOV: Objection, form.

12 THE WITNESS: Yeah, like we talked about
13 before, I think it is in CDL, but if it isn't,
14 it's in CAES.

15 BY MS. ROBINSON:

16 Q. Thank you.

17 A. Yeah.

18 Q. If we could go to page 10, please.

19 Great. The paragraph at the bottom that starts
20 "for example," states a figure for how many SBEs
21 were enumerated in 2010. Would the number of
22 SBE's enumerated for 2010 be found in the 2010
23 NRFU assessment document?

24 A. Not in the NRFU assessment. It would
25 be in a different assessment of the SBE process

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 itself.

2 Q. Where is that assessment located?

3 MR. SVERDLOV: Objection, foundation.

4 THE WITNESS: It would also -- sorry. Did I
5 hear somebody's voice?

6 MR. SVERDLOV: Continue.

7 THE WITNESS: Oh, okay.

8 Presumably it's located in the same
9 location online as the NRFU assessment.

10 BY MS. ROBINSON:

11 Q. Besides being online, do you know where
12 in the Census Bureau those assessments are
13 maintained?

14 MR. SVERDLOV: Objection, foundation.

15 THE WITNESS: Yeah, I don't know. We would
16 have to go get a location for you.

17 BY MS. ROBINSON:

18 Q. Okay. This sentence also provides the
19 SBE number for the 2020 census. Where is that
20 data maintained?

21 A. That would be in CDL.

22 Q. Thank you.

23 A. Yeah.

24 Q. The sentence also provides metrics on
25 TNSOLs, Targeted Nonsheltered Outdoor Locations.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Is that data also for 2020 in the CDL?

2 A. Yes.

3 Q. Where is it for 2010?

4 MR. SVERDLOV: Objection, foundation.

5 THE WITNESS: Yeah, it would also be in an
6 assessment somewhere.

7 BY MS. ROBINSON:

8 Q. Okay. So it would be in a separate
9 TNSOL assessment?

10 A. Honest, I don't --

11 MR. SVERDLOV: Objection.

12 THE WITNESS: Sorry Alex.

13 MR. SVERDLOV: Objection, form.

14 THE WITNESS: Yeah, I don't know if it's in
15 a separate assessment or if they are combined.

16 BY MS. ROBINSON:

17 Q. If it were combined, would the -- would
18 it be combined with the SBE assessment?

19 A. It could be. Like I said, I'm not
20 certain. There is a whole cadre of assessments
21 from 2010.

22 Q. Could you please go to page 23. So the
23 second paragraph that starts "Because," it says
24 in the second line, "We could tell on the phone
25 how long an enumerator took on every question.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 We could tell how long they took when they did
2 the interview, where they were -- where they

3 were when they took the interview," and they
4 were enumerating because the Geo codes match.
5 Where is this type of data maintained?

6 A. The CDL.

7 Q. Okay. Thank you.

8 I would like to ask a few questions
9 about the field, the field personnel and field
10 management system.

11 Could you please provide an overview of
12 the field's management structure?

13 MR. SVERDLOV: Objection, vague and outside
14 the scope of the deposition.

15 THE WITNESS: Okay. So a little more
16 specific.

17 BY MS. ROBINSON:

18 Q. Sure.

19 A. At what level -- what are you hunting
20 for here?

21 BY MS. ROBINSON:

22 Q. I'm interested in how the field -- the
23 various levels in the field communicate with
24 each other and submit data to one another. So I
25 thought it might help to start with the

↑

1 different levels of field management.

2 MR. SVERDLOV: Objection, form.

3 THE WITNESS: Okay. All right. So there is
4 an enumerator. The enumerators work for census
5 field supervisors. Census field supervisors
6 work for census field managers. Census field
7 managers work for area census office managers.
8 Area census office managers work for area
9 managers. Area managers work for ARCMs,
10 assistant regional census manager.

11 They work for -- and then by that point
12 we're in the regional office staff. Do you need
13 more granular than that or does that get you
14 high enough?

15 BY MS. ROBINSON:

16 Q. No, that's very helpful.

17 A. Okay.

18 Q. And then where do the field regional
19 directors fit into that?

20 A. They are a couple of levels above the
21 ARCM.

22 Q. Okay.

23 THE COURT REPORTER: Counsel, sorry to
24 interrupt. Could anybody not speaking put
25 yourself on mute.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. And what system is used to assign the
3 work to the enumerators?

4 A. So in what fashion?

5 Q. To assign the -- to assign enumerators
6 what households they should visit, everything
7 else they do during NRFU?

8 MR. SVERDLOV: Objection, vague and compound.

9 THE WITNESS: FOCS sends the cases to the
10 enumeration device.

11 BY MS. ROBINSON:

12 Q. Okay.

13 A. Assignments can either come as part of
14 the optimization process or they can be directly
15 assigned by a census field manager or someone
16 else with equivalent permissions.

17 Q. Okay. And are all communications
18 between the census field manager and the
19 enumerator -- I'll ask it again.

20 How do the census field managers
21 communicate with the enumerators?

22 A. They can call them. They can text
23 them.

24 Q. Okay.

25 A. We're fairly limited because we --

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 enumerators do not have email.

2 Q. Okay. What is the process for field
3 personnel, meaning enumerators or census field
4 supervisors, to lodge complaints with their
5 supervisors or the Census Bureau?

6 MR. SVERDLOV: Objection, vague.

7 THE WITNESS: Which -- which -- one question,
8 please.

9 BY MS. ROBINSON:

10 Q. Sure, I'll ask another way.

11 A. Okay.

12 Q. Is there a system that logs complaints
13 from field personnel?

14 A. Not a single system, no.

15 Q. Okay. What are the systems that
16 reflect the complaints?

17 A. There are -- there is various ways that
18 they can lodge complaints. They can call their
19 supervisor and complain. They can call higher
20 up in the chain and complain. They can send
21 emails from their personal email accounts and

22 complain. There is even public addresses that
23 they can complain to, you know, complain to.
24 And then they have all the normal routes that an
25 employee could -- could complain and we give

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 them that information. They can call these
2 inspector general. They can call the office of
3 special counsel. They can call the EEO office.
4 All of those places can lodge complaints. So
5 there is no one single place we can go to find
6 complaints.

7 Q. Let's look at an example. Before I do
8 that, is there a correspondence management
9 system?

10 MR. SVERDLOV: Objection, vague.

11 THE WITNESS: How do you mean?

12 BY MS. ROBINSON:

13 Q. Is there a system called the
14 correspondence management system that you know
15 of?

16 A. I don't know.

17 Q. Okay. Do you know if the complaint --

18 A. It's not on the list.

19 Q. I know it's not on the list.

20 Do you know if the complaints are kept
21 in the communications directorate?

22 A. Depending on the route in which they
23 come in to the Bureau, they can be logged there.
24 So if it comes in through the routes that the
25 communications director logs, yes, they would be

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 logged there. If it comes in via one of those
2 other routes, not necessarily.

3 Q. And what are the routes that the
4 communications directorate logs?

5 A. I don't know. We would have to go find
6 that information for you.

7 Q. Okay. Do you know if complaints are
8 maintained by the regional offices?

9 A. I do not.

10 Q. If complaints are elevated to the
11 Census Bureau headquarters, do you know how
12 those are documented?

13 MR. SVERDLOV: Objection, vague.

14 THE WITNESS: Where in headquarters?

15 BY MS. ROBINSON:

16 Q. The director, for example.

17 A. Email.

18 Q. Okay. Do you know of any central
19 database or repository where the complaints are
20 stored?

21 A. No.

22 Q. Do you know who at the Bureau has
23 responsibility for field personnel complaints?

24 A. I don't know that I understand the
25 question.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. I'm wondering if someone like Timothy
2 Olson or James Christy or someone under them
3 would be charged with the responsibility of
4 field personnel complaints?

5 MR. SVERDLOV: Objection, form.

6 THE WITNESS: I don't know. I'm sorry.

7 BY MS. ROBINSON:

8 Q. That's fine.

9 Do you know of any processes or
10 procedures determining when a complaint should
11 be elevated to a manager?

12 MR. SVERDLOV: I'm going to object based on
13 scope.

14 THE WITNESS: How -- could you clarify a
15 little bit, please?

16 BY MS. ROBINSON:

17 Q. Sure. Do you know of any process
18 documents that explain when a complaint should
19 be provided to a manager?

20 A. I don't.

21 Q. Okay.

22 MS. ROBINSON: Could we go to Exhibit 8,
23 please.

24 TECHNICIAN WERT: Sure. Stand by one moment.

25 MS. ROBINSON: No, I'm sorry. We've already

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 done Exhibit 8. We don't need to go to that.

2 BY MS. ROBINSON:

3 Q. Could we talk a little bit about
4 post-data collection processing. Is there
5 something called a universe control and
6 management system that was developed to track
7 the enumeration activities of the 2010 census?

8 A. Yes.

9 Q. Okay. Does that system exist today?

10 A. No.

11 Q. Is the data from that system now in the
12 CDW?

13 A. The outputs from that system would be.

14 I don't know if the databases themselves from
15 there would be in the database warehouse.

16 Q. Would they be archived somewhere else?

17 A. I don't know.

18 Q. Okay. Can the Bureau compare how many
19 housing units were resolved via administrative
20 record in a given ACO in 2000 and 2010?

21 A. We didn't use administrative records in
22 2000 and 2010.

23 Q. Okay. What about by proxy? And I'll
24 ask the question again.

25 Can the Bureau compare how many housing

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 units were resolved via proxy in a given ACO in
2 2000 and 2010?

3 A. The ACO structure is different, so we
4 couldn't make a comparison between the 2010 ACO
5 and a 2020 ACO.

6 Q. Okay. What about by tract?

7 A. I don't know. Remember how when we
8 talked about tract-based estimates before and I
9 said I would want to talk to others to determine
10 if there is some subtle nuance I'm not missing?
11 Same answer here.

12 Q. Okay. But the data for 2000 and 2010
13 was maintained on a tract basis?

14 A. The data were main -- are records like
15 we talking about before, so address-by-address
16 records, so presumably, yes, they would be
17 tract-based for at least for 2010.

18 For 2000, again, I would want to go
19 check documentation.

20 Q. Okay. And do the tracts change from
21 2000, 2010, 2020?

22 A. Yes, they can.

23 Q. They do. Okay.

24 MS. ROBINSON: Can we now, please, move to
25 Exhibit 13.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 TECHNICIAN WERT: Stand by one moment.

2 MS. ROBINSON: Actually I'm going to ask a
3 few questions before we put that up.

4 BY MS. ROBINSON:

5 Q. Are you familiar with the term data
6 anomalies as it is used by the Census Bureau?

7 A. Yes.

8 Q. Okay. So the Census Bureau keeps
9 records of data anomalies?

10 MR. SVERDLOV: Objection, misleading.

11 BY MS. ROBINSON:

12 Q. Does the Census Bureau keep records of
13 data anomalies?

14 A. Yes.

15 Q. Okay. Where are those records
16 maintained?

17 A. There is a tract -- there is a
18 spreadsheet that they have been using to track
19 them for post-processing.

20 Q. Okay. What is that spreadsheet called?

21 A. I don't know the name of it.

22 Q. Who maintains it?

23 A. It's a good question. We could find
24 out.

25 Q. Where is it located?

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MR. SVERDLOV: Objection, vague.

2 THE WITNESS: Again, we can find out.

3 BY MS. ROBINSON:

4 Q. Where is the spreadsheet that has the
5 data anomalies located? You can answer.

6 A. I don't know. We could find out.

7 Q. Okay. Do you know if it's an Excel

8 spreadsheet?

9 A. Sorry, my computer just almost shut
10 down on me. That would be inconvenient.

11 Presumably, it's Excel.

12 Q. Okay. Okay.

13 And do you know if the spreadsheet is
14 being populated manually or is it being
15 populated by data from a system like CDL?

16 A. Manually.

17 Q. Okay. And how is the data anomaly
18 information being reported to the group that is
19 then filling out the spreadsheet?

20 MR. SVERDLOV: Objection, form and
21 foundation.

22 THE WITNESS: So I'm not certain.

23 BY MS. ROBINSON:

24 Q. Okay.

25 MS. ROBINSON: Okay, if we could go to

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Exhibit 13 now, please.

2 TECHNICIAN WERT: And, Counsel, this will be
3 Exhibit 8, correct?

4 MS. ROBINSON: Yes, right, right. These are
5 from file document.

6 TECHNICIAN WERT: Okay. Great. Thank you
7 very much.

8 (Whereupon, Adams Deposition
9 Exhibit 8 was marked for
10 identification.)

11 BY MS. ROBINSON:

12 Q. So Ms. Adams, have you seen this
13 document before?

14 A. Yes.

15 Q. Okay. Can you tell me what it is,
16 please?

17 A. DRF1 anomaly summary.

18 Q. Okay. And do you know where this data
19 came from?

20 MR. SVERDLOV: Objection, vague.

21 THE WITNESS: From the issue tracker that
22 they are using to track issues with the DRF1.

23 BY MS. ROBINSON:

24 Q. I'm sorry, the DRF1?

25 A. Yes.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. What is the DRF1?

2 A. Decennial Response File, number 1.

3 Q. Okay. Right.

4 So is the issue tracker the same thing
5 as what I was just calling the Excel, or is that
6 a different document?

7 A. Same thing.

8 Q. Okay.

9 A. And to be fair, I don't know that it's
10 Excel. There is some method of tracking it.

11 Q. Okay. Understood. We'll call it
12 tracker if that makes sense.

13 A. There you go.

14 Q. Okay. Thank you.

15 Do you know how often the tracker is
16 updated?

17 A. I do not.

18 MR. SVERDLOV: Objection, foundation.

19 BY MS. ROBINSON:

20 Q. Do you know what group put this anomaly
21 summary together?

22 A. No.

23 Q. Okay. Okay.

24 MS. ROBINSON: Could we put up Exhibit 14,
25 please.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 TECHNICIAN WERT: Sure. Stand by one moment.

2 Okay. It's on screen now and this will be
3 marked as Exhibit 9.

4 (Whereupon, Adams Deposition
5 Exhibit 9 was marked for
6 identification.)

7 BY MS. ROBINSON:

8 Q. Okay. If you can go to the next page,
9 please.

10 Have you seen this document before,
11 Ms. Adams?

12 A. Yeah, can you scroll through it for me,
13 please.

14 I've at least seen a version of it, if
15 not this exact version.

16 Q. Okay. Fair enough.

17 So this document is titled 2020 Census
18 Post-Collection Processing. And can you tell me
19 what source reflects the data on this document?

20 MR. SVERDLOV: Objection, form.

21 THE WITNESS: There is not a data source for
22 it. This is the --

23 BY MS. ROBINSON:

24 Q. Okay.

25 A. -- a list of activities that need to

UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 happen in order -- that happen as we go through
2 our post-collection processing.

3 Q. Do you know what group authored this
4 document?

5 A. I am not certain.

6 Q. Okay. Do you know how this document is
7 used at the Bureau?

8 MR. SVERDLOV: Objection, vague.

9 THE WITNESS: Presumably to track whether
10 activities are being completed and to capture
11 status as people discuss them.

12 BY MS. ROBINSON:

13 Q. Okay.

14 MS. ROBINSON: Can we turn to Exhibit 15,
15 please.

16 TECHNICIAN WERT: Sure. Stand by one moment.
17 And it's on screen now. Counsel, would you like
18 this marked as well? It will be Exhibit 10?

19 MS. ROBINSON: Yes, thank you.

20 (Whereupon, Adams Deposition
21 Exhibit 10 was marked for
22 identification.)

23 TECHNICIAN WERT: Thank you

24 BY MS. ROBINSON:

25 Q. And if we could scroll to the next

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 page, please. Is this the tracker we were just
2 discussing of anomalies?

3 A. This is a document of those anomalies
4 which require patches.

5 Q. Okay. Is this -- are the anomalies on
6 this document pulled from the tracker?

7 A. Yes.

8 Q. Okay. Thank you.

9 A. Yep, you bet. So I have a question
10 back. How long are we going to go? If we are
11 going to be done in 15 minutes I don't want to
12 stop. If it's going to be another 45 minutes or
13 an hour, I'd want to stop and take a quick
14 break.

15 Q. So I was hoping to be done at 3. But
16 it could be 3:15, so I'm fine if you want to
17 take a five-minute break.

18 THE WITNESS: Yeah, can we do five quick?

19 MS. ROBINSON: Yes.

20 THE WITNESS: Thank you.

21 THE VIDEOGRAPHER: Going off the record at
22 2:32.

23 (Whereupon, a recess was had at
24 2:32 p.m., after which the
25 deposition was resumed at

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

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1 2:39 p.m. as follows:)
2 THE VIDEOGRAPHER: Back on the record, 2:39.
3 BY MS. ROBINSON:
4 Q. Okay. Ms. Adams, can you tell me what
5 the CUF quality indicators are?
6 A. By that do you mean a series of quality
7 metrics drive once the CUF is created?
8 Q. Yes.
9 A. Can you give me examples thereof?
10 Q. Yes.
11 A. To make sure we're using the same
12 words.
13 Q. Identified as duplicate enumerations
14 across different addresses; records that do not
15 contain information sufficient for
16 deduplication; records that require status or
17 count imputation.
18 Should I keep going?
19 A. No, no. I understand what you're
20 talking about now. So those are a series of

21 indicators that -- that can tell us information
22 about the quality of the census.

23 Q. And where are those applied to the
24 data?

25 MR. SVERDLOV: Objection, vague.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: So they aren't applied. They
2 are computed.

3 BY MS. ROBINSON:

4 Q. Okay.

5 A. These are indicators, metrics, one
6 might say, that are computed after the CUF is
7 created that would tell us information about how
8 the census went.

9 Q. Okay.

10 A. What the -- what the end result looks
11 like.

12 Q. And is there a system that's used to
13 calculate those?

14 A. They are calculated off of the census
15 unedited file.

16 Q. Are they queried in the file?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: Analysts write code to

19 calculate them.

20 BY MS. ROBINSON:

21 Q. Okay. After they are calculated, where
22 are they reflected?

23 MR. SVERDLOV: Objection, vague.

24 THE WITNESS: Yeah, how do you mean?

25 BY MS. ROBINSON:

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 Q. Are they reflected in the CUF file
2 itself?

3 A. Oh, okay. No. No. They would be --
4 they would be published as part of a document.

5 Q. What document would that be?

6 A. Part of the data quality group that is
7 producing information. It would be part of a
8 series of -- of documents that would be
9 produced.

10 Q. Okay. So do you know if quality --
11 those quality indicators can be searched by
12 tract?

13 MR. SVERDLOV: Objection, vague.

14 THE WITNESS: Yeah, I don't know what level
15 they are planning to create the quality
16 indicators at yet.

17 BY MS. ROBINSON:

18 Q. Were they -- were the quality
19 indicators by tract in the 2010 census?

20 A. I don't know.

21 Q. Okay. Okay.

22 So sitting here today, could you run a
23 search to determine how many records in a city
24 were duplicates?

25 MR. SVERDLOV: Objection, vague.

↑

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: No.

2 BY MS. ROBINSON:

3 Q. Why not?

4 A. Because we haven't run the duplication
5 processes. We would need to wait for the CUF to
6 do that.

7 Q. Could you run a search to determine how
8 many records in a certain county were missing a
9 name?

10 A. Yeah. So we can do preliminary
11 estimates of those kinds of things, but they are
12 preliminary until the proper post-collection
13 processes are run.

14 Q. And for those preliminary estimates

15 what database is used to run those?

16 A. One second. So you can use CDL. You
17 could also use the DRF1 that's been produced
18 when its ready.

19 Q. Are any of those -- have any of those
20 preliminary estimates been run?

21 A. Which ones, from -- give me a list of
22 those that you are interested in.

23 Q. Sure.

24 A. Okay, cool.

25 Q. It's really any of the CUF quality

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 indicators but some more examples are ones
2 that inquire -- excuse me, ones that required
3 item imputation for race, Hispanic origin, sex
4 and age from administrative records --

5 A. Yeah.

6 Q. -- lacking complete names or date of
7 birth.

8 A. Preliminary estimates have been run on
9 the DRF1.

10 Q. And what format is that estimate data
11 in?

12 A. You mean how do we present that to

13 people? Is that what you mean?

14 Q. Exactly. Is it in Excel?

15 A. Yeah, there is a PowerPoint deck with
16 some of the information if it.

17 Q. Okay.

18 A. A couple of PowerPoint decks.

19 Q. And who maintains those decks?

20 A. It depends on the analyst who is doing
21 the work and at what time. So, for example, the
22 item imputation for, I think you said race and
23 Hispanic origin, there is a slide deck as part
24 of the data quality group. Some preliminary
25 estimates were run and are part of the CIG

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 decks. So there is a couple of different places
2 where we have been monitoring this over time.

3 Q. Okay. Are there names for those
4 PowerPoints if we wanted to identify them?

5 A. I knew you were going to ask that. I
6 don't know what the actual name of the file is.
7 The data quality has a slide deck that has item
8 missing imputation rates, and they are part of
9 the CIG decks over time.

10 Q. You said they are part of CIG decks?

11 A. Yes.

12 Q. Great. I have a couple questions on
13 CIG. So let's do that now?

14 Q. Do you know when -- well, I'll ask this
15 way. So when you say they are part of the CIG
16 decks, what do you mean by that?

17 A. So we're talking about something like
18 item imputation, right?

19 Q. Uh-huh.

20 A. Okay. So once -- once a week we --
21 there was a CIG -- there was a CIG presentation
22 from the realtime analysis of data group.

23 And --

24 Q. Okay.

25 A. -- sometimes it would include things

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 like item imputation.

2 Q. Okay. So the census integration group
3 receives briefings on a weekly basis?

4 A. Roughly weekly, yes.

5 Q. And is there a central repository for
6 all of those briefings?

7 A. Yes.

8 Q. What is that?

9 A. It's on a share point site.

10 Q. Okay. And do you know if those
11 briefings have to be reviewed by the disclosure
12 review board before being made public?

13 A. Yes.

14 Q. All of them have to be reviewed by the
15 disclosure review board before being made
16 public?

17 A. Yes.

18 Q. Okay. Do all of the briefings have
19 confidential information in them?

20 A. I don't know if all of them do.

21 Q. Okay.

22 A. There was recently an effort to review
23 all of the decks so that they can be provided.

24 Q. Thank you.

25 A. Yes.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 MS. ROBINSON: Could we please look at
2 Exhibit 17?

3 TECHNICIAN WERT: Sure. Stand by one moment.

4 MS. ROBINSON: Thank you.

5 TECHNICIAN WERT: And, Counsel, do you want
6 this marked as well?

7 MS. ROBINSON: Yes. Thank you.

8 TECHNICIAN WERT: This will be Exhibit 11 and
9 it is on screen now.

10 (Whereupon, Adams Deposition
11 Exhibit 11 was marked for
12 identification.)

13 MS. ROBINSON: And if you can go to the next
14 page, please.

15 BY MS. ROBINSON:

16 Q. So this is an Operational -- and it's a
17 PowerPoint, I think a slide deck, entitled
18 Operational and Processing Options to Meet
19 Statutory Date of December 31st, 2020, For
20 Apportionment dated August 3rd, 2020.

21 I'm going ask if this document looks
22 familiar, but I will have the tech scroll
23 through it before I ask you that.

24 MS. ROBINSON: If you could please scroll
25 through.

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1 TECHNICIAN WERT: Sure thing.

2 MS. ROBINSON: Thank you.

3 THE WITNESS: Yes, it looks familiar.

4 MS. ROBINSON: Great.

5 BY MS. ROBINSON:

6 Q. Could you please go to page 12 and it
7 might be page -- oh, yes, that's the one. Okay,
8 great.

9 So I'm asking these questions only from
10 a data processing perspective just to put that
11 context out there. But this document says,
12 first of all, and you can -- I'll give you a
13 minute to read the page maybe and then I'll ask
14 you a couple questions.

15 A. Okay.

16 Q. So what steps is the Bureau taking with
17 regards to data to effectuate the presidential
18 memo described here?

19 MR. SVERDLOV: Hold on one second. I'm going
20 to object on the basis of scope.

21 I fail to see how this line of
22 questions is at all within the scope of the
23 topics that the plaintiffs have noticed for this
24 deposition. So the witness's testimony on this
25 line of questions will be solely from her

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1 knowledge and not on behalf of the Census
2 Bureau.

3 MS. ROBINSON: And I'll renew my objection
4 that plaintiff's view it's squarely within the
5 topics because I'm asking about data that
6 resides with the Census Bureau.

7 MR. SVERDLOV: I'm sorry, one second. Maybe
8 it will be helpful to go off the record because
9 that is not how the question was phrased.

10 THE VIDEOGRAPHER: Would you like to go off
11 the record, Mr. Sverdlov? Is that what you just
12 said?

13 MS. ROBINSON: That's fine with me.

14 THE VIDEOGRAPHER: Okay. Going off the
15 record at 2:52.

16 (Whereupon, a recess was had at
17 2:52 p.m., after which the
18 deposition was resumed at
19 2:57 p.m. as follows:)

20 THE VIDEOGRAPHER: And we are back on the
21 record at 2:57. Please continue.

22 BY MS. ROBINSON:

23 Q. Okay. So what, if any, data sources
24 are being used to effectuate the president's
25 memorandum described on this slide?

↑

1 A. I don't know the data sources. In
2 order to provide those, we'd need to get a list
3 from the team that's working on it.

4 Q. Okay. And who is that team?

5 A. It is led by Dr. Abowd.

6 Q. Are the data sources that Dr. Abowd is
7 using including in the list of 52 that we
8 discussed earlier?

9 MR. SVERDLOV: Objection, foundation and
10 form.

11 THE WITNESS: Yeah, I don't know what sources
12 they are using. So I can't answer whether they
13 are in a list of 52.

14 BY MS. ROBINSON:

15 Q. Do you know if there -- well, let's
16 see. The second bullet references using
17 administrative records.

18 A. Correct.

19 Q. Do you know how Dr. Abowed's group is
20 using administrative records in this process?

21 MR. SVERDLOV: I'm going to object on the
22 basis of scope on this testimony. And so the
23 witness would not be testifying on behalf of the
24 Census Bureau. She is testifying in her
25 personal capacity.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: I don't know. We need to get
2 that information from Dr. Abowd.

3 BY MS. ROBINSON:

4 Q. Abowd. Thank you.

5 The first bullet says that work was
6 already done based on Executive Order 13380.

7 Do you know -- or please tell me which
8 data sources were used to perform that work.

9 A. Yeah, again, I don't know. We would
10 have to get that information.

11 Q. Okay. A few questions regarding the
12 Census Bureau's process for collecting documents
13 in response to document requests.

14 Is that process the same for both
15 litigation and responding to congressional
16 inquiries?

17 MR. SVERDLOV: Objection, vague.

18 THE WITNESS: Yeah, is there a specific
19 incident -- set of collections you are asking
20 about?

21 BY MS. ROBINSON:

22 Q. Just generally, does the Census Bureau
23 have a process for responding to litigation

24 requests?

25 MR. SVERDLOV: Objection, vague.

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 THE WITNESS: I guess I don't understand the
2 substance of the question.

3 BY MS. ROBINSON:

4 Q. Is there a team that handles responding
5 to litigations requests on behalf of the Census
6 Bureau?

7 A. Yes.

8 Q. What is that team?

9 A. Are we talking about the decennial
10 census now?

11 Q. I'm referencing litigation requests
12 that are issued to the Census Bureau. What team
13 is responsible for responding to those?

14 A. Yeah, I don't know if there is one team
15 that responds to every litigation, to all
16 litigation requests from a central location.

17 Q. Do you know the team that responds to
18 congressional inquiries on behalf of the Census
19 Bureau?

20 A. I do not know the name of the team.

21 Q. Do you know the name of the group that

22 responds on behalf of the Census Bureau to GAO
23 inquiries?

24 A. So, again, are we -- are we talking
25 about the decennial census itself, inquiries

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1 about the decennial?

2 Q. Yes.

3 A. Then, yes, it goes to the decennial
4 census communications office when we can.

5 Q. Is that office charged with responding
6 to inquiries from Congress?

7 A. I don't know.

8 Q. What group is in charge with responding
9 to the recent requests for information from the
10 House Oversight Committee?

11 A. I don't know the name of the group.

12 Q. Do you know the name of a person?

13 A. No.

14 MS. ROBINSON: Could we please go to
15 Exhibit 24.

16 TECHNICIAN WERT: Sure. Stand by one moment.
17 And would you like this marked as well?

18 MS. ROBINSON: Yes, thank you.

19 TECHNICIAN WERT: Okay, this will be

20 Exhibit 12, one moment.

21 (Whereupon, Adams Deposition

22 Exhibit 12 was marked for

23 identification.)

24 TECHNICIAN WERT: Exhibit 12 is on screen now

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 BY MS. ROBINSON:

2 Q. Are you familiar with this document
3 from the House?

4 A. No.

5 Q. Are you familiar with an -- I should
6 say, are you prepared to testify today about the
7 Census Bureau's response to the House Oversight
8 Committee's request for documents and subpoena?

9 A. Do you have a specific question you
10 want me to answer?

11 Q. Yeah. Are you prepared today to talk
12 at all -- I'm sorry. Are you prepared today to
13 testify about that topic?

14 A. Not in any sort of detail, no.

15 Q. Okay.

16 MS. ROBINSON: So Mr. Sverdlov, one of the
17 topics that you actually had agreed to provide a

18 witness on was the status of the Census Bureau's
19 responses to document requests from the House
20 Oversight Committee.

21 Is that Ms. Adams or is that the
22 Department of Commerce witness?

23 MR. SVERDLOV: So that is Ms. Adams. And I
24 think if Ms. Adams were allowed to consult any
25 of the reference materials that we provided, she

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1 might be in a position to answer your questions.

2 MS. ROBINSON: Are those the reference
3 materials that you produced this morning to us?

4 MR. SVERDLOV: Those are the ones I sent to
5 you this morning, yes.

6 MS. ROBINSON: Okay. Well, I'll ask a few
7 more questions here.

8 BY MS. ROBINSON:

9 Q. Is the Census Bureau planning to
10 provide any -- any additional document
11 productions to the House?

12 A. I don't know.

13 Q. Could you please look at one of the
14 reference documents in order to answer that
15 question?

16 A. Sure.

17 MR. SVERDLOV: So just as a technical matter,
18 how would you like to handle Ms. Adams viewing
19 the materials? I had -- we had provided that
20 material to her in the course of preparation.
21 So I imagine that she might have it in her
22 possession right now.

23 But I -- given the peculiarities of the
24 online system, I wanted to be sure that we're
25 not crossing wires in terms of what you want her

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1 to be looking at and...

2 MS. ROBINSON: Right. Frankly, I don't know.
3 Because we haven't -- I haven't been able to
4 look at those documents, given when they were
5 produced. So I would like some testimony on
6 this topic.

7 MR. SVERDLOV: Yeah. I mean, I can -- I can
8 direct your attention to the reference sheet
9 that I believe Ms. Adams may be testifying from.
10 If I'm incorrect, Ms. Adams can correct me.

11 MS. ROBINSON: I think -- why don't we do
12 this. Why don't we not have Ms. Adams look at
13 any documents right now. That will give us a

14 chance to review them and decide which, if any,
15 we actually want to put in exhibits for. I'll
16 ask a few more questions and see if she's able
17 to provide any other testimony on this topic
18 today.

19 MR. SVERDLOV: So you're welcome to do that,
20 but I will note that the witness has -- has a
21 right and opportunity to consult reference
22 materials that were used in the course of
23 preparing her for a 30(b)(6) deposition.

24 And so to the extent that you do not
25 permit her to look at those materials and want

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1 testimony without those materials, I want that
2 reflected in the record and I want it to be
3 clear that any inability or -- ability or
4 inability she has to answer these questions is
5 on the basis of her not being given access to
6 the documents.

7 MS. ROBINSON: Yeah, and I would state that
8 our position is that if she wanted to use
9 reference documents they should have been
10 provided to us far in advance so we could review
11 them and decide whether we thought it was

12 appropriate and they could be entered as
13 exhibits in the deposition.

14 But since we haven't had an opportunity
15 to do that, we don't view it as equitable to
16 have her testify from documents.

17 MR. SVERDLOV: That's a novel position. I'm
18 not familiar with any basis for that position.
19 You are welcome to ask her questions about those
20 documents. You are welcome to authenticate
21 them, to ask her in general terms about the
22 course of their preparation.

23 But as this is 30(b)(6) deposition, I
24 am aware of no rule, order or procedure that
25 would have required me to run the documents used

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1 in the course of preparing the witness by
2 opposing counsel first.

3 MS. ROBINSON: No. But to have her reference
4 and testify. I don't even know if they are
5 written by her. I haven't even had a chance to
6 view them.

7 So I will just ask her the questions I
8 have and we can go from there.

9 BY MS. ROBINSON:

10 Q. Ms. Adams, are you aware that there
11 were document requests issued from the House
12 Committee on Oversight and Reform on
13 November 19, 2020, to the Census Bureau?

14 A. Yes.

15 Q. What did the Census Bureau do at that
16 time to identify and produce responsive
17 information?

18 A. I don't know.

19 Q. What is the process by which the Census
20 Bureau is collecting, reviewing, and producing
21 documents responsive to the House Committee's
22 requests now?

23 A. I don't know.

24 Q. Do you know what databases are being
25 used to identify responsive information?

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1 A. No.

2 Q. Do the documents that you reviewed in
3 preparation for this deposition have that
4 information on them?

5 A. No.

6 Q. Do you know if documents were
7 identified for production to that request from

8 the House before November 24th?

9 A. I do not.

10 Q. Do the documents that you used to
11 prepare for this deposition have that
12 information on them?

13 A. Not that I remember.

14 Q. Were documents identified for
15 production in response to the House request and
16 then provided to the general counsel for
17 clearance?

18 A. I don't know.

19 Q. Were the documents you were provided in
20 preparation for the deposition -- or did the
21 documents you were provided in preparation for
22 the deposition have that information on them?

23 A. Not that I remember.

24 Q. Do you know how many productions have
25 been made to the House thus far?

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UNCERTIFIED ROUGH DRAFT - T. ADAMS

1 A. No.

2 Q. Were you provided that information
3 before the deposition?

4 A. Not that I remember.

5 Q. Do you know if those productions went

6 to the disclosure review board?

7 A. I don't know.

8 Q. And do you know if the Census Bureau
9 intends to make any future productions to the
10 House Committee on Oversight?

11 A. I don't know.

12 Q. I have a couple questions about the
13 document productions in this matter.

14 Are you prepared to testify on those?

15 A. To the extent that I know the answers.

16 Q. Well, as a 30(b)(6) witness, you're
17 supposed to know the answers. So have you been
18 prepared to testify about the document
19 productions made in this litigation?

20 MR. SVERDLOV: I'm going to renew by
21 objection on the basis of the fact that the
22 witness is not being given access to the
23 reference materials by counsel. So she is
24 answering these without the benefit of being
25 able to consult those materials.

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1 MS. ROBINSON: Okay. Mr. Sverdlov, why don't
2 you point out to me which of the documents you
3 sent this morning would have information for her

4 about the productions in this matter.

5 MR. SVERDLOV: Yes, I'm happy to. So in
6 the -- give me one second. In the zip file that
7 I transmitted to you, the document that has
8 the -- that bears the name reference sheet is a
9 sheet that contains information related to that
10 topic.

11 MS. ROBINSON: Okay.

12 BY MS. ROBINSON:

13 Q. And Ms. Adams, are you prepared to
14 testify to anything beyond what is in this
15 document that your counsel just described?

16 MR. SVERDLOV: Objection.

17 THE WITNESS: No.

18 MR. SVERDLOV: I'm sorry. Objection. I'm
19 going to object on that question on the basis of
20 vagueness and mischaracterizing the prior
21 several hours of testimony.

22 MS. ROBINSON: Okay. Those are all the
23 questions I have. Thank you, Ms. Adams.

24 THE VIDEOGRAPHER: Anything, Mr. Sverdlov?

25 MR. SVERDLOV: We reserve the right to read

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1 and sign the transcript.

2 THE VIDEOGRAPHER: Then this then concludes
3 the deposition. The time is 3:15 p.m. We are
4 going off the video record.

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